

Exhibit D

Part 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

2. Powell’s wild accusations are demonstrably false. Far from being created in Venezuela to rig elections for a now-deceased Venezuelan dictator, Dominion was founded in Toronto for the purpose of creating a fully auditable paper-based vote system that would empower people with disabilities to vote independently on verifiable paper ballots. As it grew, Dominion developed technology to solve many of the technical and voter intent issues that came to light as a result of the 2000 Presidential Election. Its systems are certified under standards promulgated by the U.S. Election Assistance Commission (“EAC”), reviewed and tested by independent testing laboratories accredited by the EAC, and were designed to be auditable and include a paper ballot backup to verify results.¹ Since its founding, Dominion has been chosen by thousands of election officials throughout the United States to provide the technology to effectively administer transparent and fully auditable elections.

3. Because of these safeguards, there are mountains of direct evidence that conclusively disprove Powell’s vote manipulation claims against Dominion—namely, the millions of paper ballots that were audited and recounted by bipartisan officials and volunteers in Georgia and other swing states, which confirmed that Dominion accurately counted votes on paper ballots.

¹ “Dominion” refers to Plaintiffs, US Dominion, Inc. and its subsidiaries, Dominion Voting Systems, Inc. and Dominion Voting Systems Corporation. “Powell” refers to Defendants Sidney Powell and her alter egos Sidney Powell, P.C. and Defending the Republic, Inc.



Poll workers count paper ballots while poll watchers observe in Gwinnett County, Georgia on November 14, 2020.

4. When respected Georgia Republicans disproved Powell’s false accusations by announcing that Georgia’s paper ballot recount had verified the accuracy of Dominion’s vote counts, Powell sought to discredit them by falsely accusing Dominion of paying kickbacks to them and their families in return for a no-bid contract. The only “evidence” Powell ever put forward to support that false accusation was a doctored certificate from the Georgia Secretary of State. Powell has insinuated that the fact that the certificate is undated is suspicious. In reality, the authentic certificate is dated and is publicly available on the Georgia Secretary of State’s website, along with public records showing there was a competitive bid process for the Georgia contract and that Dominion competed against Smartmatic and Election Systems & Software (“ES&S”).²

² Georgia Secretary of State, *Elections Security Is Our Top Priority: Security-Focused Tech Company, Dominion Voting to Implement New Verified Paper Ballot System*, available at, <https://sos.ga.gov/securevoting/> (Ex. 1).

5. Although Powell assured the public during television and radio appearances that her claims were backed by “evidence,” Powell’s “evidence” included declarations from a motley crew of conspiracy theorists, con artists, armchair “experts,” and anonymous sources who were judicially determined to be “wholly unreliable.”³ One of Powell’s wholly unreliable sources was a purported “military intelligence expert” who has now admitted that he never actually worked in military intelligence, that the declaration Powell’s clerks wrote for him to sign is “misleading,” and that he “was trying to backtrack” on it.⁴ After he was discredited, Powell pivoted by presenting his declaration as having been written by a different anonymous source.

6. During some of her media appearances Powell also touted a shocking declaration from an “anonymous source” purporting to be a Venezuelan military officer alleging a decades-old conspiracy beginning with now-deceased Venezuelan dictator Hugo Chávez.⁵ But the explanation in the “anonymous witness’s” declaration for why he purportedly came forward was a near-verbatim recitation from another declaration put forward by Powell, proving that those witnesses did not write their declarations independently and raising serious questions about what role Powell and her team played in drafting the declaration.⁶

³ Order at 24-25, *Bowyer v. Ducey*, No. 2-20-cv-02321 (D. Ariz. Dec. 9, 2020) [Dkt. 84].

⁴ Emma Brown, Aaron C. Davis & Alice Crites, *Sidney Powell’s secret ‘military intelligence expert,’ key to fraud claims in election lawsuits, never worked in military intelligence*, Wash. Post (Dec. 11, 2020), available at, https://www.washingtonpost.com/investigations/sidney-powell-spider-spyder-witness/2020/12/11/0cd567e6-3b2a-11eb-98c4-25dc9f4987e8_story.html (Ex. 2).

⁵ Declaration of an anonymous source claiming to have been selected for the “national security guard detail of the President of Venezuela,” *Pearson v. Kemp*, No. 1:20-cv-04809 (N.D. Ga. Nov. 25, 2020) [Dkt. 1-2 at ¶ 4].

⁶ *Compare* Declaration of an anonymous source claiming to have been selected for the “national security guard detail of the President of Venezuela,” *Pearson v. Kemp*, No. 1:20-cv-04809 (N.D. Ga. Nov. 25, 2020) [Dkt. 1-2 at ¶ 4], available at, https://defendingtherepublic.org/?page_id=986 with Statement by Ana Mercedes Diaz Cardozo, *Pearson v. Kemp*, No. 1:20-cv-04809 (N.D. Ga. Nov. 25, 2020) [Dkt. 1-3 at ¶ 3], available at, https://defendingtherepublic.org/?page_id=986.

7. Powell deliberately lied about having a video of Dominion’s founder saying he could “change a million votes, no problem at all.” Powell has never produced that recording because it does not exist.

8. As a result of the defamatory falsehoods peddled by Powell—in concert with like-minded allies and media outlets who were determined to promote a false preconceived narrative—Dominion’s founder, Dominion’s employees, Georgia’s governor, and Georgia’s secretary of state have been harassed and have received death threats, and Dominion has suffered enormous harm.

9. After Dominion sent Powell a letter putting her on formal notice of the facts and the death threats and asking her to retract her false claims, Powell doubled down, tweeting to her 1.2 million Twitter followers that she heard that “#Dominion” had written to her and that, although she had not even seen Dominion’s letter yet, she was “retracting nothing” because “[w]e have #evidence” and “They are #fraud masters!”⁷ To ensure that her tweet would be published to the largest possible audience and inflict maximum harm on Dominion, Powell tagged some of her allies with massive Twitter followings, including Donald Trump, Georgia-based defamation attorney L. Lin Wood, and Powell’s client, Trump’s former National Security Advisor Michael Flynn.

10. In the days and weeks that followed, Powell appeared for a number of media interviews and continued to double down on her false accusations about Dominion.

11. Dominion brings this action to set the record straight, to vindicate the company’s rights under civil law, to recover compensatory and punitive damages, to seek a narrowly tailored injunction, and to stand up for itself and its employees.

⁷ Retraction Demand Letter from T. Clare and M. Meier to S. Powell (Dec. 16, 2020) (Ex. 3); Sidney Powell (@SidneyPowell1), Twitter (Dec. 20, 2020), available at, <https://twitter.com/SidneyPowell1/status/1340760761228996614> (Ex. 4).

PARTIES

12. Plaintiff US Dominion, Inc. is a for-profit Delaware corporation with its principal place of business in Denver, Colorado.

13. Plaintiff Dominion Voting Systems, Inc. is a for-profit Delaware corporation with its principal place of business in Denver, Colorado.

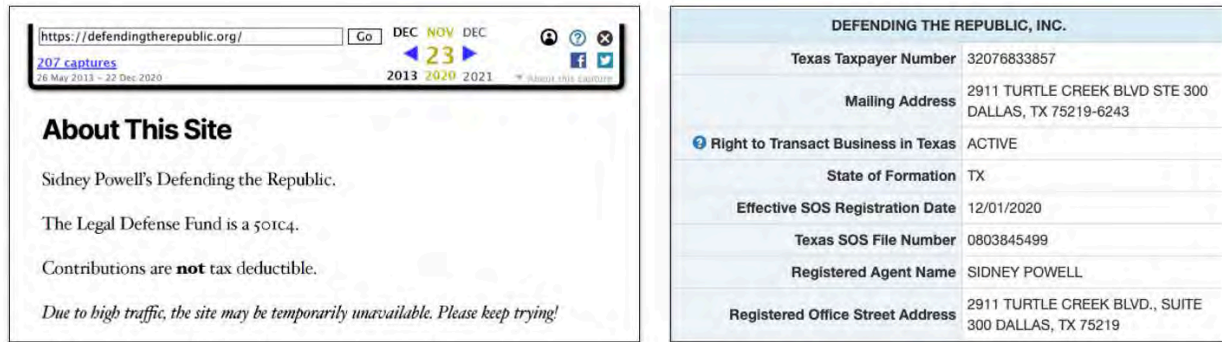
14. Plaintiff Dominion Voting Systems Corporation is a for-profit Ontario corporation with its principal place of business in Toronto, Ontario.

15. Defendant Sidney Powell is a self-proclaimed “media figure,” self-published author of a book that purports to be a seminal work in “exposing ‘the Deep State,’” a licensed attorney, and a member of the State Bar of Texas who practices law solely as Sidney Powell, P.C. She is domiciled in Texas.

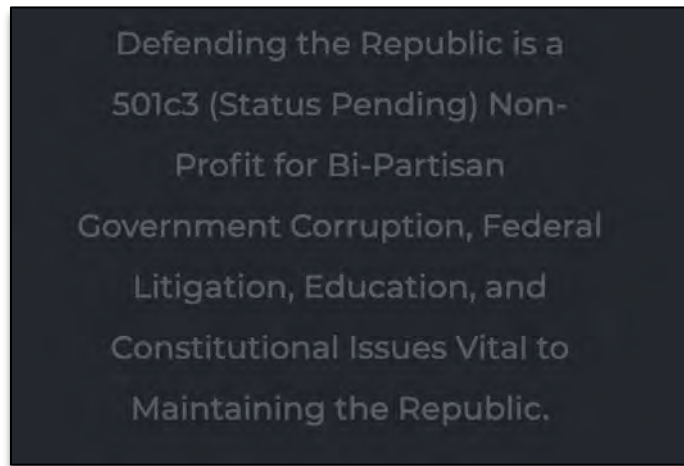
16. Defendant Sidney Powell, P.C. (“Powell’s law firm”) is a law firm owned and operated by Sidney Powell as a sole proprietorship, where she acts as its president. There is a unity of ownership and interest between Sidney Powell and Sidney Powell, P.C., such that there is no discernable difference between them. Sidney Powell, P.C. is registered in the State of Texas and maintains an address with the Texas Secretary of State at Sidney Powell’s home address.

17. Defendant Defending the Republic, Inc. (“Powell’s fundraising website”) is the corporate form that was belatedly incorporated to solicit “millions of dollars” online at <https://defendingtherepublic.org/>, a website created shortly after the 2020 election. The separate corporate entity for Powell’s fundraising website was not created until December 1, 2020, *after* Powell had appeared on television to solicit donations to the website and *after* the website began

representing to potential donors that it was a 501(c)(4) organization.⁸



18. On or before January 7, 2021, defendingtherepublic.org began representing to potential donors that it is a “501c3 (Status Pending) Non-Profit.”⁹



19. Unlike contributions to 501(c)(3) organizations, contributions to 501(c)(4) organizations are not tax deductible.

⁸ Sidney Powell talks about her allegations regarding the computerized voting systems on election night, Washington Examiner (Nov. 20, 2020), available at, <https://www.washingtonexaminer.com/videos/sidney-powell-talks-about-her-allegations-regarding-the-computerized-voting-systems-on-election-night> (last visited Jan. 4, 2021) (Ex. 5); Sidney Powell on Lou Dobbs Tonight on 11/30/20, YouTube (Nov. 30, 2020), available at, <https://www.youtube.com/watch?v=4uMr-TRZNCw> (last visited Jan. 4, 2021) (Ex. 6); Defending the Republic (Nov. 23, 2020), available at, <https://web.archive.org/web/20201123034128/https://defendingtherepublic.org/> (Ex. 7).

⁹ Defending the Republic Contact Page, available at, https://defendingtherepublic.org/?page_id=15 (last visited Jan. 7, 2021).

20. As of January 7, 2021, Defending the Republic, Inc. did not appear in a search of 501(c)(3) organizations or 501(c)(4) organizations on the IRS website.¹⁰

The screenshot displays the IRS website's search interface for tax-exempt organizations. The search results page for 'Defending the Republic, Inc.' shows no results. The search criteria include 'Organization Name' set to 'Defending the Republic, Inc.', 'City' set to 'Enter City', 'State' set to 'All States', and 'Country' set to 'United States'. A message indicates that the search did not return any results. Below the message, there are links for 'Exempt Organizations Business Master File Extract (EO BMF)' and 'Tax Exempt Organization Search Bulk Data Downloads'.

21. Defending the Republic, Inc. has three directors: Sidney Powell, L. Lin Wood, and Brannon Castleberry, who, upon information and belief, is the owner of CWL Consulting, “a strategy group specializing in PR/Crisis Comms, Governmental Affairs, and Marketing.” Defending the Republic, Inc. is a Texas corporation that shares a mailing address with Powell’s law firm, Sidney Powell, P.C.

JURISDICTION AND VENUE

22. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1332 because there is complete diversity of citizenship between Plaintiffs and Defendants and the amount in controversy exceeds \$75,000.00, exclusive of interest and costs.

¹⁰ Compare November 23, 2020 capture of <https://defendingtherepublic.org/> (Ex. 7) with IRS Tax Exempt Organization Search, available at, <https://apps.irs.gov/app/eos/allSearch> (Ex. 8).

23. This Court has personal jurisdiction over all Defendants pursuant to § 13-423 of the District of Columbia Code because Defendants: (i) transacted business within the District of Columbia; (ii) caused tortious injury by acts committed within the District of Columbia, including and specifically by making false and defamatory statements about Dominion from within the District of Columbia; (iii) and caused tortious injury by acts committed outside the District of Columbia while regularly doing business within, engaging in persistent conduct within, and deriving substantial revenue from services rendered within the District of Columbia.

24. This Court has personal jurisdiction over Sidney Powell because she travelled to the District of Columbia shortly after the election and then made defamatory statements about Dominion from within the District of Columbia, including to members of the Trump Campaign, to Donald Trump, at a press conference on November 19, 2020, and during various media appearances in November and December. Powell did multiple defamatory media appearances giving rise to the case from a hotel room in the Trump International Hotel in Washington, D.C.—and, upon such information and belief, stayed in the Trump International Hotel in Washington, D.C. during much of the time period relevant to this case. Powell was in Washington, D.C. when she repeatedly visited the White House in December to pressure Donald Trump to appoint her special counsel to investigate the false accusations giving rise to this defamation case. In addition, Powell regularly travels to and transacts business within the District of Columbia, and she derives substantial revenue from such services rendered within the District of Columbia, including by soliciting funds to her fundraising website and by representing Michael Flynn in the District Court for the District of Columbia.

25. This Court has personal jurisdiction over Sidney Powell P.C. because (1) it regularly transacts business within the District of Columbia, such as its recent representation of

Michael Flynn in the District Court for the District of Columbia, and it derives substantial revenue from such services rendered within the District of Columbia; (2) it employs two at least attorneys who are members of the District of Columbia Bar, Brandon Johnson and Julia Haller, both of whom work from an office in the District of Columbia; (3) it, through Sidney Powell, made defamatory statements about Dominion from within the District of Columbia; and (4) it is an alter ego of Sidney Powell.

26. This Court has personal jurisdiction over Defending the Republic, Inc. because (1) it regularly transacts business within the District of Columbia, as it advertises and solicits donations from residents of the District of Columbia; (2) it transacted business within the District of Columbia by soliciting donations from within the District of Columbia through Sidney Powell's defamatory media appearances that were done from within the District of Columbia and by funding the work of Sidney Powell and Sidney Powell, P.C.; (3) it maintains an office in the District of Columbia at 601 Pennsylvania Ave., NW, South Building, Ste. 900, Washington, D.C., 20004; (4) attorneys employed by Defending the Republic, Inc. engage in the practice of law in the District of Columbia; and (5) it is an alter ego of Sidney Powell.

27. Requiring Defendants to litigate these claims in the District of Columbia does not offend traditional notions of fair play and substantial justice and is permitted by the Due Process Clause of the United States Constitution. Dominion's claims arise in part from defamatory statements Powell made about Dominion from within the District of Columbia, including to members of the Trump Campaign, to Donald Trump, at a press conference on November 19, 2020, and during various media appearances in November and December. Defendants avail themselves of numerous privileges in the District of Columbia, including those set forth above.

28. Venue is proper in this Court under 28 U.S.C. § 1391(b) because a substantial part of the events giving rise to the claims in this Complaint occurred in this District and, as discussed above, because Defendants are subject to the Court's personal jurisdiction in this District.

FACTUAL ALLEGATIONS

After Being Founded in John Poulos's Basement in Toronto, Dominion Becomes an American Company and Provides Machines to Help Local Election Officials Count Paper Ballots

29. In 2002, John Poulos had an idea that he thought could help blind people vote on paper ballots, so he founded a business out of his basement in Toronto and incorporated it under Ontario law as Dominion Voting Systems Corporation.

30. By 2009, the business had grown in the United States and a subsidiary company, Dominion Voting Systems, Inc., was incorporated in Delaware and headquartered in Denver, Colorado. Poulos voluntarily worked with the Committee on Foreign Investment in the United States ("CFIUS") to ensure they knew who he was and who was invested in Dominion.

31. By 2018, the majority of the business's customers and employees were in the United States, so Poulos sold the majority stake of the business to U.S. investors.

32. Today, Dominion's business is organized as US Dominion, Inc. and its two wholly owned subsidiaries, Dominion Voting Systems, Inc. and Dominion Voting Systems Corporation (collectively, "Dominion").

33. Dominion contracts with state and local governments to provide its voting systems and services in a majority of states across the country. Those contracts are typically multi-year contracts and range from tens of thousands of dollars to over a hundred million dollars, depending on the jurisdiction and scope of the contract. For example, Dominion's contract with the state of Georgia—implemented in 2019—is a 10-year contract valued at over \$100 million. Given the nature of the U.S. election system and the voting services industry, Dominion's contracts have

historically been long term with high renewal rates. In 2020, Dominion had contracts in 28 states and Puerto Rico.

34. Dominion provides local election officials with tools they can use to run elections, such as voting machines that count paper ballots.

35. Dominion's voting systems are certified under standards promulgated by the EAC and reviewed and tested by independent testing laboratories accredited by the EAC.

36. In 2016, when Donald Trump was elected president of the United States, Dominion's technology was used in 1,635 jurisdictions in more than two dozen "red" and "blue" states.

Dominion Provides Machines to Count Paper Ballots for Local Election Officials in Georgia and Numerous Other "Red" and "Blue" States and Counties for the 2020 Election

37. As set forth in government records that are publicly available on the Georgia Secretary of State's website, there was a competitive bid process to provide voting machines for use in the 2020 election in Georgia.¹¹ Dominion competed against Smartmatic (further evidence that they are separate companies) and ES&S for the Georgia contract.¹²

38. After scoring the highest in the competitive bid process, Dominion won the Georgia contract.¹³ This initial contract is for a 10-year term and valued at over \$100 million.

39. On August 9, 2019, Georgia's Republican Secretary of State Brad Raffensperger signed and sealed a certificate attesting that Dominion's systems had "been thoroughly examined

¹¹ Georgia Secretary of State, *Elections Security Is Our Top Priority: Security-Focused Tech Company, Dominion Voting to Implement New Verified Paper Ballot System*, available at, <https://sos.ga.gov/securevoting/> (Ex. 1).

¹² *Id.*

¹³ *Id.*

and tested and found to be in compliance with” applicable Georgia law. That certificate is dated and is publicly available on the Secretary of State’s website.¹⁴

40. In 2020, state and local election officials and bipartisan poll workers administered their elections by using Dominion’s tabulation devices to count paper ballots in Georgia and many other “red” and “blue” states and numerous counties.

***Independent Audits and Hand Recounts of Paper Ballots
Prove That Dominion’s Vote Counts Were Accurate***

41. The voter verified paper ballots are the hard evidence that can be easily used to verify the accuracy of the Dominion machine counts. If Dominion or anyone else had rigged the election by manipulating the vote counts in the Dominion machines—whether by “weighting” votes, trashing votes, adding votes, or otherwise—the number of paper ballots that were verified and cast by voters would not match the machine counts. In fact, independent 100% hand audits and recounts of paper ballots have repeatedly verified the accuracy of the vote counts from Dominion machines.

42. After a 100% hand audit of all the ballots cast in Georgia in the 2020 election, Georgia’s Republican Secretary of State Brad Raffensperger explained that “Georgia’s historic first statewide audit reaffirmed that the state’s new secure paper ballot voting system accurately counted and reported results.”¹⁵

¹⁴ *Id.*; Georgia Secretary of State, Dominion Certification (Aug. 9, 2019), available at, https://sos.ga.gov/admin/uploads/Dominion_Certification.pdf (Ex. 10).

¹⁵ Georgia Secretary of State, *Historic First Statewide Audit of Paper Ballots Upholds Result of Presidential Race*, available at, https://sos.ga.gov/index.php/elections/historic_first_statewide_audit_of_paper_ballots_upholds_result_of_presidential_race#:~:text=2020%20Qualifying%20Packet-,Historic%20First%20Statewide%20Audit%20of%20Paper%20Ballots%20Upholds%20Result%20of,machine%20tally%20of%20votes%20cast (Ex. 11).

43. At the request of the Trump Campaign, in addition to the hand audit, Georgia also conducted a subsequent machine recount, which again affirmed the original outcome of the presidential race in Georgia.

44. As Secretary of State Raffensperger explained after a signature match audit affirmed the outcome of the 2020 presidential race in Georgia for a third time, “The Secretary of State’s office has always been focused on calling balls and strikes in elections and, in this case, three strikes against the voter fraud claims and they’re out.”¹⁶

45. Similarly, as Secretary Raffensperger explained to Donald Trump during a telephone call that was reported by *The Washington Post*, “I don’t believe that you’re really questioning the Dominion machines. Because we did a hand re-tally, a 100 percent re-tally of all the ballots, and compared them to what the machines said and came up with virtually the same result. Then we did the recount, and we got virtually the same result. So I guess we can probably take that off the table. I don’t think there’s an issue about that.”¹⁷

46. Similarly, in a press conference, an official from Georgia’s Secretary of State’s office explained, “Let’s just go to the other ridiculous claims, that Dominion voting machines are somehow using fractional voting or flipping votes. Again, by doing the hand tally, it shows none of that is true. Not a whit.”¹⁸

¹⁶ Georgia Secretary of State, *3rd Strike Against Voter Fraud Claims Means They’re Out After Signature Audit Finds No Fraud*, https://sos.ga.gov/index.php/elections/3rd_strike_against_voter_fraud_claims_means_theyre_out_after_signature_audit_finds_no_fraud (Ex. 12).

¹⁷ Amy Gardner and Paulina Firozi, *Here’s the full transcript and audio of the call between Trump and Raffensperger*, *Wash. Post*, (Jan. 3, 2021), available at, https://www.washingtonpost.com/politics/trump-raffensperger-call-transcript-georgia-vote/2021/01/03/2768e0cc-4ddd-11eb-83e3-322644d82356_story.html (Ex. 13).

¹⁸ *WATCH: Georgia election officials reject Trump call to ‘find’ more votes*, PBS (Jan. 4, 2021), available at, <https://www.pbs.org/newshour/politics/watch-live-georgia-secretary-of-states-office-holds-press-conference> (Ex. 14).

47. A hand recount of paper ballots in Antrim County, Michigan confirmed that “Dominion’s voting machines accurately tabulated the votes cast for president in Antrim County.”¹⁹

48. A spokesperson for the Michigan Secretary of State confirmed, “We have not seen any evidence of fraud or foul play in the actual administration of the election ... What we have seen is that it was smooth, transparent, secure and accurate.”²⁰

49. Following a bipartisan investigation into the vote in Antrim County, Michigan, the state’s Republican Senate Majority Leader Mike Shirkey announced, “Our investigation, which has been very intense, discovered none, none of the allegations and accusations against Dominion [are] true.”²¹

50. In Arizona, the Chairman of the Maricopa County Board of Supervisors released a statement explaining, “The evidence overwhelmingly shows the system used in Maricopa County is accurate and provided voters with a reliable election ... The Dominion tabulation equipment met mandatory requirements during logic and accuracy testing before the Presidential Preference Election, the Primary Election and the General Election. And after each of these 2020 elections, the hand count audit showed the machines generated an accurate count.”²²

¹⁹ See *Trump still wins small Michigan county after hand recount*, Associated Press (Dec. 17, 2020), available at, <https://apnews.com/article/election-2020-joe-biden-donald-trump-michigan-elections-07e52e643d682c8033a0f26b0d863387> (Ex. 15).

²⁰ Nick Corasaniti, Reid J. Epstein & Jim Rutenberg, *The Times Called Officials in Every State: No Evidence of Voter Fraud*, N. Y. Times (Nov. 10, 2020), available at, <https://www.nytimes.com/2020/11/10/us/politics/voting-fraud.html> (Ex. 16).

²¹ Abigail Censky, *How Misinformation Lit The Fire Under A Year Of Political Chaos In Michigan*, NPR (Jan. 1, 2021), available at, <https://www.npr.org/2021/01/01/952528193/how-misinformation-lit-the-fire-under-a-year-of-political-chaos-in-michigan> (Ex. 17).

²² Letter from Clint Hickman to Maricopa County Voters (Nov. 17, 2020), available at, <https://www.maricopa.gov/DocumentCenter/View/64676/PR69-11-17-20-Letter-to-Voters#:~:text=Here%20are%20the%20facts%3A&text=The%20evidence%20overwhelmingly>

51. The Elections Infrastructure Government Coordinating Council and the Election Infrastructure Sector Coordinating Executive Committees released a joint statement confirming that there is “*no evidence* that any voting system deleted or lost votes, changed votes, or was in any way compromised.”²³ The Joint Statement was signed and endorsed by, among others, the National Association of State Election Directors, National Association of Secretaries of State, and the U.S. Cybersecurity & Infrastructure Security Agency (“CISA”)—then led by a Trump appointee, Chris Krebs.

Members of the Trump Campaign Raise Alarms About Powell’s Baseless Claims, But She Nevertheless Appears as an Agent of the Campaign and Donald Trump at a Press Conference in Washington, D.C.

52. Early on, Powell decided on a false preconceived narrative to excuse Trump’s impending loss in the 2020 election: during a televised interview with One America News Network (“OAN”) on Election Day, she claimed that Democrats were trying to “steal the vote” from Trump and that “they ha[d] developed a computer system to alter votes electronically.”²⁴

53. In her efforts to make the evidence conform to that false preconceived narrative, Powell found an ally in Patrick Byrne. Byrne was previously the CEO of Overstock.com, but abruptly resigned his board seat and position as CEO after it was revealed that he had had a romantic affair with the now-notorious Russian agent, Maria Butina, who was sentenced to 18 months in prison after being indicted by federal prosecutors for trying to infiltrate powerful

[%20shows%20the,voters%20with%20a%20reliable%20election.&text=As%20required%20by%20law%20\(A.R.S,used%20in%20any%20Arizona%20elections](#) (Ex. 18).

²³ Cybersecurity & Infrastructure Security Agency, *Joint Statement From Elections Infrastructure Government Coordinating Council & The Election Infrastructure Sector Coordinating Executive Committees* (Nov. 12, 2020), available at, <https://www.cisa.gov/news/2020/11/12/joint-statement-elections-infrastructure-government-coordinating-council-election> (Ex. 19) (emphasis added).

²⁴ *Sidney Powell: Dems will use ‘lawfare’ to alter election*, OAN (Nov. 5, 2020), available at, <https://defendingtherepublic.org/?p=1154>; https://www.youtube.com/watch?v=Vh5U_6apzvI&feature=emb_logo (last visited Jan. 7, 2021) (Ex. 20).

political circles in the United States at the direction of the Russian government.²⁵ The day after the 2020 election, Byrne got in touch with Powell and Rudy Giuliani and told them that he knew months before the election that “goons” were going to steal the election, that he had started funding a plan in August, “had this plotted out what they were going to do,” and had “reverse engineered” how the election was stolen.²⁶ According to Byrne, his claims were “a little farfetched for other people in Washington,” and Giuliani “came at this a bit differently,” but Powell “was totally super receptive to what we had to say.”²⁷

54. A couple of days after the election, Powell showed up at the Trump Campaign’s headquarters and began pressing the campaign to focus suspicion on Dominion, saying that the Dominion strategy was ideal because it would draw into question the accuracy of voting in so many states.²⁸

55. When Trump Campaign attorneys Justin Clark and Matt Morgan sought evidence from Powell, she produced none. They then told others that they should not present the Dominion theory because there was no evidence for it.²⁹

²⁵ Michael Corkery, *Overstock C.E.O. Takes Aim at ‘Deep State’ After Romance With Russian Agent*, N.Y. Times (Aug. 15, 2019), available at, <https://www.nytimes.com/2019/08/15/business/overstock-paul-byrne-maria-butina-affair.html> (Ex. 21).

²⁶ *Patrick Byrne Explains Trump Path to Victory*, Corsi Nation (Dec. 24, 2020), available at, <https://www.stitcher.com/show/corsi-nation-by-jerome-r-corsi-phd/episode/dr-corsi-news-12-24-20-patrick-byrne-explains-trump-path-to-victory-80388895> (Ex. 22).

²⁷ *Id.*

²⁸ Aaron C. Davis, Josh Dawsey, Emma Brown & Jon Swaine, *For Trump Advocate Sidney Powell, a playbook steeped in conspiracy theories*, Wash. Post (Nov. 28, 2020), available at, https://www.washingtonpost.com/investigations/sidney-powell-trump-kraken-lawsuit/2020/11/28/344d0b12-2e78-11eb-96c2-aac3f162215d_story.html (Ex. 23).

²⁹ *Id.*

56. At least one other Trump Campaign official was surprised by Powell's sudden involvement and observed that Powell did not seem interested in having evidence.³⁰

57. On November 6, 2020, around the same time Powell was meeting with the Trump Campaign, the domain name defendingtherepublic.org was registered, and Powell began using it as a fundraising website. By at least November 10, 2020, Powell's fundraising website proclaimed, "Over \$500,000 must be raised in the next twenty-four hours" for her "to halt the certification of ballots in Georgia, Michigan, Nevada, Pennsylvania, and Wisconsin."³¹ (Despite that representation, Powell is now admittedly using funds contributed to her fundraising website to fund her own legal defense.)³²

³⁰ *Id.*

³¹ Defending the Republic (Nov. 10, 2020), <https://web.archive.org/web/20201110221040/http://1dfftar.org/> (Ex. 24).

³² *The Rush Limbaugh Show*, iHeart Radio (Dec. 29, 2020), available at, <https://www.iheart.com/podcast/1119-the-rush-limbaugh-show-57927691/episode/the-rush-limbaugh-show-podcast--75675693/> (last visited Jan. 7, 2021) (Ex. 25) (Powell: defendingtherepublic.org is a "non-profit that is working to help me defend all these cases **and to defend me** now that I'm under massive attack from the attorney general of Michigan and the City of Detroit and everything else.") (emphasis added).

58. From November 8 to December 14—Powell, acting in concert with like-minded allies in the media, appeared on Fox Business, *The Epoch Times*, the Washington Examiner’s podcast *Examining Politics*, and *The John Fredericks Show* to solicit donations to her fundraising website and to peddle the falsehood that Dominion was created in Venezuela to rig elections for Hugo Chávez, and had in fact rigged the 2020 U.S. Presidential Election by using “algorithms” in its machines to change the ballots and to “flip” and “shave” votes.³³



³³ Sidney Powell talks about her allegations regarding the computerized voting systems on election night, Washington Examiner (Nov. 20, 2020), available at, <https://www.washingtonexaminer.com/videos/sidney-powell-talks-about-her-allegations-regarding-the-computerized-voting-systems-on-election-night> (Ex. 5) (last visited Jan. 4, 2021); Sidney Powell on Lou Dobbs Tonight on 11/30/20, YouTube (Nov. 30, 2020), available at, <https://www.youtube.com/watch?v=4uMr-TRZNCw> (Ex. 6) (last visited Jan. 4, 2021); Sidney Powell to Newsmax TV: Our Case Was Prejudged, Newsmax (Dec. 7, 2020), available at, <https://defendingtherepublic.org/?p=1166>; <https://www.newsmax.com/newsmax-tv/sidney-powell-kraken-lawsuit-scotus/2020/12/07/id/1000459/> (last visited Jan. 4, 2021) (Ex. 26); Evidence of Fraud: Sidney Powell and Lou Dobbs discuss, Fox Business (Dec. 10, 2020), available at, <https://defendingtherepublic.org/?p=1168>; <https://video.foxbusiness.com/v/6215520845001/#sp=show-clips> (last visited Jan. 4, 2021) (Ex. 27); Exclusive: Sidney Powell on 2020 Election Lawsuits, Supreme Court Decision, and the Flynn Case, The Epoch Times (Dec. 13, 2020), available at, <https://defendingtherepublic.org/?p=1170>; https://www.theepochtimes.com/exclusive-sidney-powell-on-election-lawsuits-supreme-court-decision-and-the-flynn-case_3617067.html (last visited Jan. 4, 2021) (Ex. 28); Sidney Powell: Kraken Released in MI; Scotus Next!, The John Fredericks Show (Dec. 14, 2020), available at, <https://www.johnfredericksradio.com/podcast/december-14-2020/>; https://www.youtube.com/watch?v=qWt1vB-OIZk&list=PL1q2i_zsupwSdYDFTH0pA-X-YNz57E5TV&index=2 (last visited Dec. 29, 2020) (Ex. 29).

59. On November 14, 2020, Donald Trump tweeted: “I look forward to Mayor Giuliani spearheading the legal effort to defend OUR RIGHT to FREE and FAIR ELECTIONS! Rudy Giuliani, Joseph diGenova, Victoria Toensing, Sidney Powell, and Jenna Ellis, a truly great team, added to our other wonderful lawyers and representatives!”³⁴ The tweet generated nearly 50,000 comments, was retweeted over 76,000 times, and received over 325,000 likes.



60. During a Newsmax interview on November 17, Powell claimed to have bombshell evidence to substantiate her wild accusations: she promised to tweet out a video of Dominion’s founder publicly admitting he “can change a million votes, no problem at all.”³⁵ Powell never tweeted out such a video because it does not exist. The video does not exist because no such statement was ever made, nor would it be made, by Dominion’s founder.

61. Despite the fact that Trump appointee Chris Krebs had already confirmed there was no evidence of voting machine manipulation, despite the fact that Powell had told a nationally televised audience that she had incredible video evidence that she never produced, and despite the

³⁴ Donald J. Trump (@realDonaldTrump), Twitter (Nov. 14, 2020), available at, <https://twitter.com/realdonaldtrump/status/1327811527123103746> (Ex. 106).

³⁵ Sidney Powell to Newsmax: Dominion Designed to ‘Rig Elections,’ Newsmax (Nov. 17, 2020), available at, <https://www.newsmax.com/newsmax-tv/sidney-powell-dominion-voting-systems/2020/11/17/id/997526/> (last visited Dec. 4, 2020) (Ex. 30).

fact that the Trump Campaign knew that Powell had no evidence for her false accusations against Dominion, on the morning of November 19, 2020, Donald Trump invited more than 88 million of his Twitter followers to tune in for an “Important News Conference today by lawyers on a very clear and viable path to victory. Pieces are very nicely falling into place. RNC at 12 p.m.”³⁶

62. At noon on November 19, 2020, along with Giuliani and Jenna Ellis, Powell gave a televised press conference at the Republican National Committee headquarters in Washington, D.C. Giuliani stated that they were “representing President Trump and we’re representing the Trump campaign” and Ellis introduced the group as “an elite strike force team that is working on behalf of the president and the campaign.”



Sidney Powell speaks during a televised press conference from the Republican National Committee headquarters in Washington, D.C. on November 19, 2020.

63. After being introduced as a lawyer for the Trump Campaign and President Trump, Powell falsely told a global audience that Dominion was “created in Venezuela at the direction of

³⁶ Donald J. Trump (@realDonaldTrump), Twitter (Nov. 19, 2020), available at, <https://twitter.com/realDonaldTrump/status/1329408856733184008> (Ex. 31).

Hugo Chávez to make sure he never lost an election,” that Dominion flipped votes from Trump to Biden by running an algorithm that automatically flips all the votes, and that George Soros’s “number two person” Lord Malloch Brown was “one of the leaders of the Dominion project.” Based on these false assertions of fact, Powell stated, “There should never be another election conducted in this country, I don’t care if it’s for local dog catcher, using a Dominion machine ...”³⁷

64. The same day as Powell’s televised D.C. press conference with Rudy Giuliani and Jenna Ellis, someone purchased the web domain sidneypowell2024.com. Privacy services were used to hide the registrant’s name and address.

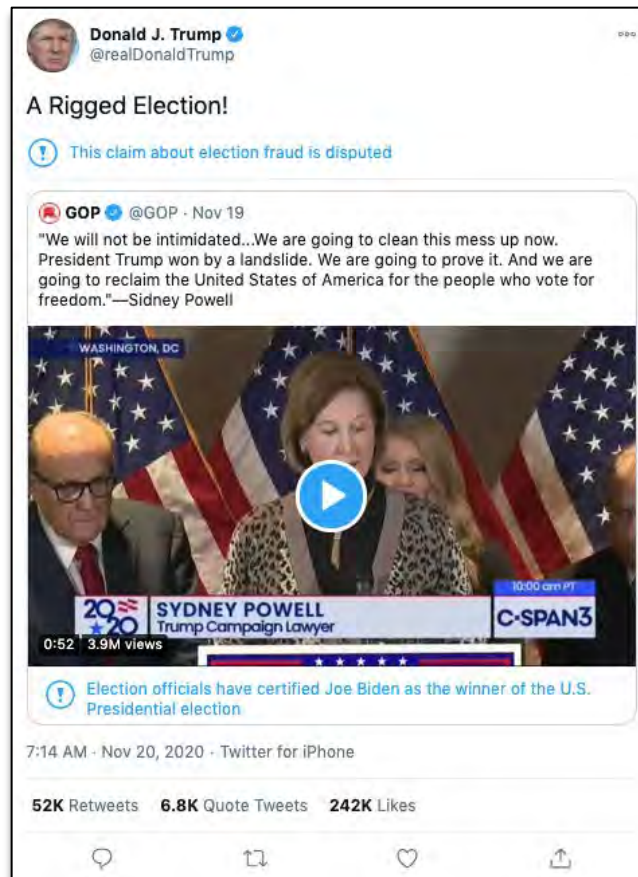
***Despite Having No Evidence to Support Her Claims,
Powell Capitalizes on Her False Accusations to Ingratiate Herself to Donald Trump***

65. The same day as the press conference, Fox News’s Tucker Carlson called Powell out for failing to produce any evidence to support her incredible claims. Despite his invitation to Powell to appear on his show and present her evidence, “she never sent [] any evidence, despite a lot of requests ... not a page.” He also stated that when he and his staff kept pressing for Powell to present evidence, “she got angry with us and told us to stop contacting her ... so we checked with others around the Trump campaign, people in positions of authority; they told us Powell has never given them any evidence either, nor did she provide any today at the press conference.” He concluded that Powell “never demonstrated that a single actual vote moved illegitimately by software from one candidate to another. Not one.”³⁸

³⁷ *Trump Campaign News Conference on Legal Challenges*, CSPAN (Nov. 19, 2020), available at, <https://www.c-span.org/video/?478246-1/trump-campaign-alleges-voter-fraud-states-plans-lawsuits> (last visited Jan. 4, 2021) (Ex. 32).

³⁸ *MUST-SEE: Tucker Carlson ABANDONS Trump’s election fraud case on air*, YouTube (Nov. 19, 2020), available at, <https://www.youtube.com/watch?v=BspHzH6RRxo> (last visited Jan. 4, 2021) (Ex. 33).

66. Despite Powell's failure to provide evidence, video of her false accusations at the D.C. press conference was foreseeably tweeted by the GOP and by Powell's ally, Donald Trump, to his more than 88 million followers, instantly and irreparably damaging Dominion's reputation and business to a global audience and putting the lives of Dominion employees in danger.³⁹



67. Emboldened by Trump's endorsement of her false accusations, which launched her into political superstardom, Powell's defamatory media campaign continued and intensified with appearances on the Fox Business program, *Mornings with Maria* and the Washington Examiner's podcast *Examining Politics*.

³⁹ Donald J. Trump (@realDonaldTrump), Twitter (Nov. 20, 2020), available at, <https://twitter.com/realDonaldTrump/status/1329760015314464770?s=20> (Ex. 34).

68. On November 20, 2020, after a hand count of 100% of the paper ballots cast in Georgia's election verified the accuracy of the machine counts and conclusively disproved Powell's accusations of voter fraud in Georgia, Georgia's Republican Governor Kemp and Secretary of State Raffensperger certified the election results in that state.⁴⁰

69. The very next day, Powell conducted a telephonic interview with Newsmax, during which she doubled down on her false accusations against Dominion, claimed that the Georgia certification was a "total farse," and claimed that "Mr. Kemp and the Secretary of State ... are in on this Dominion scam with their last-minute purchase or award of a contract to Dominion of a hundred million dollars."⁴¹ Governor Kemp and Secretary of State Raffensperger received death threats as a result of Powell's false claims.

70. The next day, on November 22, during an interview on ABC News's *This Week*, Trump loyalist Chris Christie gave an interview in which he stated "If you've got the evidence of fraud, present it. ... The conduct of the president's legal team has been a national embarrassment. Sidney Powell accusing Governor Brian Kemp of a crime, on television, yet being unwilling to go on TV and defend and lay out the evidence that she supposedly has. ... If you're unwilling to come forward and present the evidence, it must mean the evidence doesn't exist."⁴² Powell has *never*

⁴⁰ See Kate Brumback, *Georgia officials certify election results showing Biden win*, Associated Press (Nov. 20, 2020), available at, <https://apnews.com/article/georgia-certify-election-joe-biden-ea8f867d740f3d7d42d0a55c1aef9e69> (Ex. 35).

⁴¹ *Sidney Powell: It will be BIBLICAL*, Newsmax TV (Nov. 21, 2020), available at, <https://www.youtube.com/embed/Y68pEknYyCM?rel=0&start=0> (last visited Jan. 4, 2021) (Ex. 36).

⁴² Paul Kane and Felicia Sonmez, *Chris Christie calls the conduct of Trump's legal team a 'national embarrassment'*, Wash. Post (Nov. 22, 2020), available at, https://www.washingtonpost.com/politics/republicans-christie-trump-concede/2020/11/22/05c280e6-2cda-11eb-bae0-50bb17126614_story.html (Ex. 37).

come forward to present evidence that Dominion bribed Governor Kemp or Secretary Raffensperger because no such evidence exists; Powell's accusations are false.

71. That same day, someone purchased the web domain sidneypowellforpresident.com. Privacy services were used to hide the registrant's name and address.

72. In calls to the White House, several Republican senators warned that Powell seemed unhinged,⁴³ and the Trump Campaign issued the following statement: "Sidney Powell is practicing law on her own. She is not a member of the Trump Legal Team. She is also not a lawyer for the President in his personal capacity."

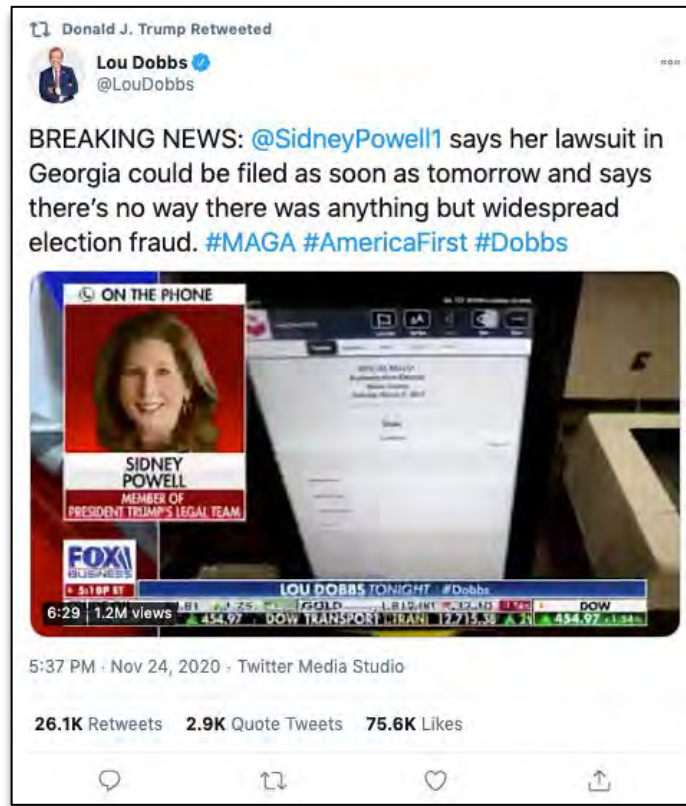


73. Powell was undeterred. On November 23, she issued public statements claiming that "votes for Trump and other Republicans" had been "stolen by massive election fraud through

⁴³ Aaron C. Davis, Josh Dawsey, Emma Brown & Jon Swaine, *For Trump Advocate Sidney Powell, a playbook steeped in conspiracy theories*, Wash. Post (Nov. 28, 2020), available at, https://www.washingtonpost.com/investigations/sidney-powell-trump-kraken-lawsuit/2020/11/28/344d0b12-2e78-11eb-96c2-aac3f162215d_story.html (Ex. 23).

Dominion” and that she was compiling “overwhelming” “evidence” that Dominion’s software “was used to shift millions of votes from President Trump...”⁴⁴

74. On November 24, just two days after the Trump Campaign had publicly distanced itself from her, Powell repeated her defamatory falsehoods about Dominion during a televised interview on the Fox Business program *Lou Dobbs Tonight*, which Powell’s ally Donald Trump foreseeably retweeted to his more than 88 million Twitter followers.⁴⁵



⁴⁴ Kathryn Watson, *Trump legal team disavows association with lawyer Sidney Powell*, CBS News (Nov. 23, 2020), available at, <https://www.cbsnews.com/news/sidney-powell-disavowed-by-trump-campaign/> (Ex. 38); Masooma Haq, *Former Republican Candidate Alleges Hard Evidence of Corruption in US Election System*, The Epoch Times (Nov. 23, 2020), available at, https://www.theepochtimes.com/expert-hard-evidence-of-corruption-in-us-election-system_3590417.html (Ex. 39).

⁴⁵ *BREAKING NEWS: Sidney Powell Tells Lou Dobbs Her Lawsuit in Georgia May Be Filed As Soon As Tomorrow*, YouTube (Nov. 24, 2020), available at, <https://www.youtube.com/watch?v=KpT2Rz4rTWM> (last visited Jan. 4, 2021) (Ex. 40); Lou Dobbs (@LouDobbs), Twitter (Nov. 24, 2020), available at, <https://twitter.com/LouDobbs/status/1331366325629968386?s=20> (Ex. 41).

***Powell and Wood File Sham Litigations and Hold a Georgia Political Rally
to Further Their Defamatory Media Campaign***

75. On November 25, Powell and her Georgia-based ally and co-counsel L. Lin Wood filed lawsuits together in federal courts in Georgia and Michigan. (Wood is known for using Twitter—until his account was permanently suspended on January 6, 2021—and Parler to falsely accuse Chief Justice John G. Roberts of being a child-murdering pedophile and to call for Vice President Mike Pence to be executed by “firing squad” for “treason.”⁴⁶) In their lawsuits, Powell and Wood alleged “massive election fraud” in the 2020 election, claiming that Dominion was “founded by foreign oligarchs and dictators to ensure computerized ballot-stuffing and vote manipulation to whatever level was needed to make certain Venezuelan dictator Hugo Chávez never lost another election.”⁴⁷ The following week, on December 1 and 2, 2020, Powell and Wood filed similar lawsuits in federal courts in Wisconsin and Arizona, repeating their false claims of “massive election fraud.”

76. As licensed attorneys, Powell and Wood were obligated to investigate the factual basis for their claims before making them in public filings. As such, they either conducted the inquiry required of them as licensed attorneys and violated their ethical obligations by knowingly

⁴⁶ Lin Wood (@LLinWood), Twitter (Jan. 1, 2021), available at, <https://twitter.com/LLinWood/status/1345067881319587840>; Lin Wood (@LLinWood), Twitter (Jan. 4, 2021), available at, <https://twitter.com/LLinWood/status/1345991175690457091>; LLinWood (@linwood), Parler (Jan. 4, 2021), available at, <https://parler.com/post/99be4095510747c2928ed02a4bc41a18> (Ex. 9).

⁴⁷ Complaint at ¶ 5, *Pearson v. Kemp*, No. 12-cv-04809 (N.D. Ga. Nov. 25, 2020) [Dkt. 1], available at, <https://defendingtherepublic.org/wp-content/uploads/2020/11/COMPLAINT-CJ-PEARSON-V.-KEMP-11.25.2020.pdf>; Complaint for Declaratory, Emergency, and Permanent Injunctive Relief at ¶ 5, *King v. Whitmer*, No. 20-cv-13134 (E.D. Mich. Nov. 29, 2020) [Dkt. 6], available at, <https://defendingtherepublic.org/wp-content/uploads/2020/11/Michigan-Complaint.pdf>.

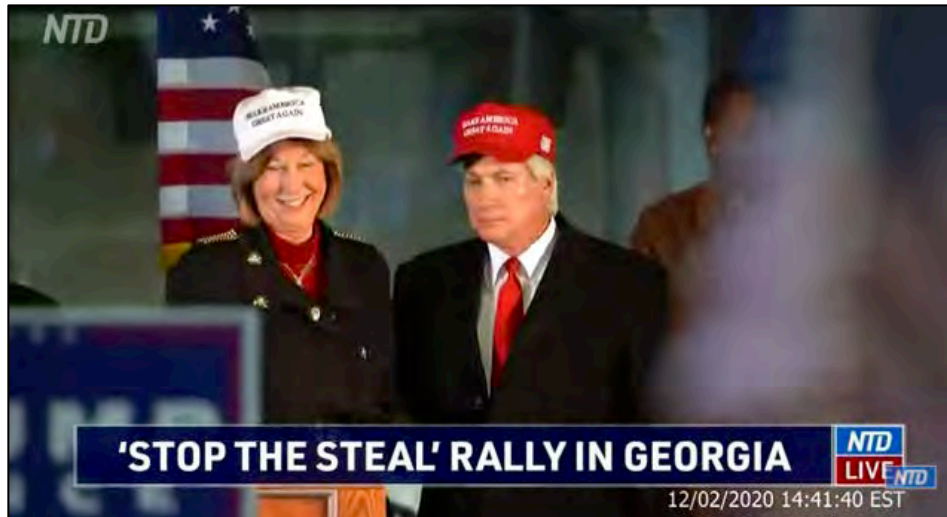
making false assertions rebutted by the information they found, or they violated their ethical obligations by purposefully avoiding undertaking the reasonable inquiry required of them.

77. After Powell and Wood had filed their election lawsuit in Georgia and posted the “evidence” from that case to their fundraising website, Trump loyalist and then-U.S. Attorney General William Barr rebutted Powell’s and Wood’s claims against Dominion, stating, “There’s been one assertion that would be systemic fraud and that would be the claim that machines were programmed essentially to skew the election results. And the DHS and DOJ have looked into that, and so far, *we haven’t seen anything to substantiate that.*”⁴⁸

78. On December 2, 2020, the same day they filed their fourth election lawsuit, Powell and Wood co-led and spoke at a televised “Stop the Steal” rally attended by Trump supporters in Alpharetta, Georgia. During the rally, Powell and Wood falsely accused Dominion of rigging the election against Trump, being created in Venezuela to rig elections for Hugo Chávez, and bribing Georgia’s governor and secretary of state. Based on those false accusations, which Wood claimed were backed by “piles of evidence” and “mountains of evidence,” Powell told the crowd that there should not be a runoff election for Georgia’s Senate seats “certainly not on Dominion machines,” and implored Georgia voters to “flood the legislators here in Georgia and the Governor and the Secretary of State with phone calls and letters.” Wood instructed the crowd to surround Governor Kemp’s house and blow their horns, led the crowd in chanting “LOCK HIM UP!,” and vowed to never vote for Kemp again. Wood also used the rally to promote OAN, Newsmax, and The Epoch Times—*i.e.*, three media outlets that gave Powell a platform and endorsed and repeated Powell’s

⁴⁸ Michael Balsamo, *Disputing Trump, Barr says no widespread election fraud*, Associated Press (Dec. 1, 2020), available at, <https://apnews.com/article/barr-no-widespread-election-fraud-b1f1488796c9a98c4b1a9061a6c7f49d> (Ex. 43).

and Wood’s false accusations about Dominion.⁴⁹ Powell and Wood both solicited donations during the rally and, at one point Wood shouted, to thunderous applause, “How about Sidney Powell and Mike Flynn in 2024?”



Sidney Powell and L. Lin Wood at their “Stop the Steal” rally in Alpharetta, Georgia, on December 2, 2020.



Hundreds gather to hear Sidney Powell and L. Lin Wood speak at a “Stop the Steal” rally in Alpharetta, Georgia, on December 2, 2020.

⁴⁹ Sidney Powell, Lin Wood attend ‘Stop the Steal’ rally in Georgia, YouTube, (Dec. 2, 2020), available at, <https://www.youtube.com/watch?v=pq-B5z3QIA> (last visited Jan. 4, 2021) (Ex. 44).

79. Within a week of their “Stop the Steal” rally in Georgia, all four of the election lawsuits Powell and Wood had filed together were dismissed. Between November 25 (the date their first election lawsuits were filed) and December 9 (the date their last election case was dismissed), when they were supposedly litigating cases they claimed would overturn the results of a U.S. presidential election, Powell gave five interviews (to Newsmax, Fox Business, *The John Fredericks Show*, and *Huckabee* with Mike Huckabee), during which she repeated her defamatory falsehoods about Dominion and touted the “evidence” on her fundraising website.

80. Powell and Wood filed their election lawsuits—which never had a chance of reversing the results of the election—with the obvious and cynical purpose of creating court documents they could post on their fundraising websites and tout as “evidence” during their media campaign, to raise funds and their public profiles, and to ingratiate themselves to Donald Trump for additional benefits and opportunities that they expected to receive as a result of their association with him. Indeed, the same day that Powell filed her election lawsuit in Georgia, Trump pardoned Powell’s client Michael Flynn—who had previously pleaded guilty to lying to the FBI. In December, Donald Trump repeatedly gave Powell an audience in the White House, where she pressured him to appoint her special counsel to investigate “election fraud,” *i.e.*, the very false accusations giving rise to this case. And, on information and belief, Powell has capitalized on her new-found fame to sell more copies of her book and t-shirts.⁵⁰

81. The Courts where Powell and Wood filed their meritless lawsuits saw right through their sham. The United States District Court for the Eastern District of Michigan found that Powell

⁵⁰ See Sidney Powell (@SidneyPowell1), Twitter (Jan. 2, 2021), available at, <https://twitter.com/SidneyPowell1/status/1345578709919670272>; see also Sidney Powell, <https://www.sidneypowell.com/shop> (last visited Jan. 7, 2021) (“Due to increased demand, new book orders are on backorder until January 1, 2021. Shop a selection of Sidney Powell’s Best Seller Licensed to Lie, and “Creeps on A Mission” T-Shirts!”).

and Wood had submitted “nothing but speculation and conjecture that votes for President Trump were destroyed, discarded or switched to votes for Vice President Biden.” Op. & Order at 34, *King v. Whitmer*, No. 20-cv-12134 (E.D. Mich. Dec. 7, 2020) [Dkt. 62].

82. The United States District Court for the District of Arizona found that the evidence put forward by Powell and Wood was impressive only for its volume and was “largely based on anonymous witnesses, hearsay, and irrelevant analysis of unrelated elections,” and includes “expert reports” that “reach implausible conclusions, often because they are derived from *wholly unreliable sources*.” Order at 24-25, *Bowyer v. Ducey*, No. 2-20-cv-02321 (D. Ariz. Dec. 9, 2020) [Dkt. 84]. The “wholly unreliable sources” put forward by Powell and Wood in that case (whose declarations were posted on Powell’s fundraising website) included Terpsichore Maras-Lindeman, Russell Ramsland, William Briggs, and Josh Merritt a.k.a. “Spyder.”

83. After her last election lawsuit was dismissed on December 9, Powell doubled down on her false accusations about Dominion; in response to a tweet by Donald Trump, she wrote, “The election & media were all #rigged. Your voters broke the #Dominion algorithm... This election fraud must be completely exposed & ended NOW for the world.”⁵¹

⁵¹ Sidney Powell (@SidneyPowell1), Twitter (Dec. 10, 2020), available at, <https://twitter.com/SidneyPowell1/status/1337251453359026183?s=20> (Exhibit 45).



84. From December 10 to 15, Powell’s defamatory media campaign continued with appearances on Fox Business’s *Lou Dobbs Tonight*, *The Epoch Times*, and *The John Fredericks Show*, during which she repeated her defamatory falsehoods about Dominion.

85. During her December 10 appearance on *Lou Dobbs Tonight*, Powell repeated her falsehoods about Dominion, claimed they were supported by “real evidence” on her fundraising website defendingtherepublic.org, and—in response to Dobbs’s offer to put forward on the broadcast whatever evidence Powell had—Powell promised to get Dobbs “more information that is just stunning tonight.”⁵² Powell broke that promise: as admitted by Dobbs weeks later, “Eight

⁵² *Evidence of Fraud: Sidney Powell and Lou Dobbs discuss*, Fox Business (Dec. 10, 2020), available at, <https://defendingtherepublic.org/?p=1168>; <https://video.foxbusiness.com/v/6215520845001/#sp=show-clips> (last visited Jan. 4, 2021) (Ex. 27).

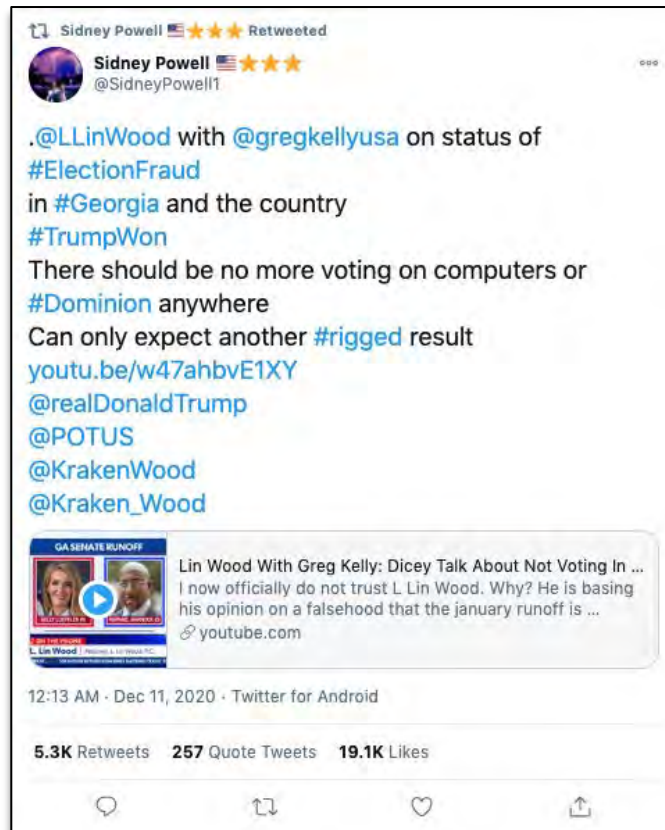
weeks from the election and we still don't have verifiable, tangible support for the crimes that everyone knows were committed... We have had a devil of a time finding actual proof.”⁵³

86. On December 11, 2020, Powell posted a tweet, tagging Donald Trump, L. Lin Wood, and Newsmax's Greg Kelly, and stating:

#ElectionFraud

There should be no more voting on computers or #Dominion anywhere

Can only expect another #rigged result⁵⁴



⁵³ Matt Wilstein (@mattwilstein), Twitter (Jan. 4, 2021), available at, <https://twitter.com/mattwilstein/status/1346245027932979200>.

⁵⁴ See Sidney Powell (@SidneyPowell1), Twitter (Dec. 11, 2020), available at, <https://twitter.com/SidneyPowell1/status/1337264198041133057> (Ex. 46).

To Bolster Her Fundraising and Defamatory Media Campaign, Powell Proffered “Evidence” That Was Deliberately Misrepresented, Manufactured, and Cherry-Picked

87. Powell put forward purported “evidence” in her court filings that was deliberately misrepresented, manufactured, and cherry-picked. Although Dominion is not currently suing Powell based on the false statements in Powell’s sham litigations, the manipulation of the judicial process apparent in Powell’s court filings is additional evidence that Powell knew the statements she made about Dominion—during her defamatory press conference in Washington, D.C., “Stop the Steal” rally, and media campaign—were false. Moreover, as further evidence of her actual malice, during her defamatory media campaign, Powell sought to lend credence to her false accusations—and to solicit donations—by touting the flawed “evidence” attached to the court filings posted to her fundraising website.

88. For example, Powell sponsored the declaration of an anonymous “military intelligence expert” code-named “Spyder,” who has since been identified as Josh Merritt.⁵⁵ Powell’s “military intelligence expert” has now admitted that he never actually worked in military intelligence and that the declaration Powell’s team wrote for him to sign is “misleading” and he “was trying to backtrack” on it.⁵⁶

89. Powell also cherry-picked Princeton professor Andrew W. Appel’s statements about a decades-old machine not designed by Dominion, which was not used in the 2020 election in any of the swing states being challenged by Powell. Powell appended Professor Appel’s cherry-picked statements to her court filings so that she could post them to her fundraising website, as

⁵⁵ Complaint at Ex. 7, *Pearson v. Kemp*, No. 12-cv-04809 (N.D. Ga. Nov. 25, 2020) [Dkt. 1-9], available at, https://defendingtherepublic.org/?page_id=986.

⁵⁶ Emma Brown, Aaron C. Davis & Alice Crites, *Sidney Powell’s secret ‘military intelligence expert,’ key to fraud claims in election lawsuits, never worked in military intelligence*, Wash. Post (Dec. 11, 2020), available at, https://www.washingtonpost.com/investigations/sidney-powell-spider-spyder-witness/2020/12/11/0cd567e6-3b2a-11eb-98c4-25dc9f4987e8_story.html (Ex. 2).

though Professor Appel’s expertise were “evidence” supporting her election-rigging claims against Dominion. In reality, Professor Appel and 58 other specialists in election security have forcefully rebutted Powell’s claims, explaining that they “have never claimed that technical vulnerabilities have *actually* been exploited to alter the outcome of any US election.”⁵⁷ They further explained that “*no credible evidence* has been put forth that supports a conclusion that the 2020 election outcome in any state has been altered through technical compromise.”⁵⁸

90. Powell also touted a shocking declaration from an anonymous purported Venezuelan military officer alleging a decades-old international election-rigging conspiracy beginning with Hugo Chávez.⁵⁹ But the “anonymous witness’s” explanation for why he purportedly came forward was a near-verbatim recitation from another declaration put forward by Powell, proving that those witnesses did not each write their declarations independently and raising serious questions about the role that Powell and her team played in drafting the declarations attached to Powell’s court filings and touted as “evidence” during her defamatory media campaign.

⁵⁷ See Tony Adams, Prof. Andrew W Appel, et al., *Scientists say no credible evidence of computer fraud in the 2020 election outcome, but policymakers must work with experts to improve confidence*, Matt Blaze (Nov. 16, 2020), available at, <https://www.mattblaze.org/papers/election2020.pdf> (Ex. 47) (emphasis added).

⁵⁸ *Id.* (emphasis added).

⁵⁹ Declaration of an anonymous source claiming to have been selected for the “national security guard detail of the President of Venezuela,” *Pearson v. Kemp*, No. 1:20-cv-04809 (N.D. Ga. Nov. 25, 2020) [Dkt. 1-2 at ¶ 4], available at, https://defendingtherepublic.org/?page_id=986; Complaint at Ex. 1, *King v. Whitmer*, No. 20-cv-13134 (E.D. Mich. Nov. 25, 2020) [Dkt. 1-1], available at, https://defendingtherepublic.org/?page_id=1015.

Declaration of an anonymous source claiming to have been selected for the “national security guard detail of the President of Venezuela,” <i>Pearson v. Kemp</i> , No. 1:20-cv-04809 (N.D. Ga. Nov. 25, 2020) [Dkt. 1-2 at ¶ 4].	Statement by Ana Mercedes Díaz Cardozo, <i>Pearson v. Kemp</i> , No. 1:20-cv-04809 (N.D. Ga. Nov. 25, 2020) [Dkt. 1-3 at ¶ 3].
“I want to alert the public and let the world know the truth about the corruption, manipulation, and lies being committed by a conspiracy of people and companies intent upon betraying the honest people of the United States and their legally constituted institutions and fundamental rights as citizens. This conspiracy began more than a decade ago in Venezuela and has spread to countries all over the world. It is a conspiracy to wrongfully gain and keep power and wealth. It involves political leaders, powerful companies, and other persons whose purpose is to gain and keep power by changing the free will of the people and subverting the proper course of governing.”	“I want to alert the public and let the world know the truth about corruption, manipulation, and lies being committed through a conspiracy of individuals and businesses with the intention of betraying the honest people of the United States and its legally constituted institutions and fundamental rights as citizens. This conspiracy began more than a decade ago in Venezuela and has spread to countries all over the world. It is a conspiracy to unjustly gain and maintain power and wealth. It involves political leaders, powerful companies, and other persons whose purpose is to gain and maintain power by changing people’s free will and subverting the proper course of governing.”

***Powell Put Forward Doctored Evidence and
Withheld Key Proof to Support Her False Accusations About Dominion***

91. Powell and Wood repeatedly told national audiences that Dominion had bribed Georgia’s Republican governor and secretary of state for a last-minute no-bid contract. They claimed to have evidence to support that accusation, but never produced it during their televised appearances or on Twitter. Instead, in their sham litigation in Georgia, they claimed that Governor Kemp and Secretary of State Raffensperger had “rushed” through the purchase of Dominion voting machines and software, noting that the Dominion certification from the secretary of state was “undated,” and attaching a copy of an undated Dominion Certification. In reality, the

authentic certificate is dated August 9, 2019—more than a year before the November 2020 election—and is publicly available online at the Georgia Secretary of State’s website.⁶⁰

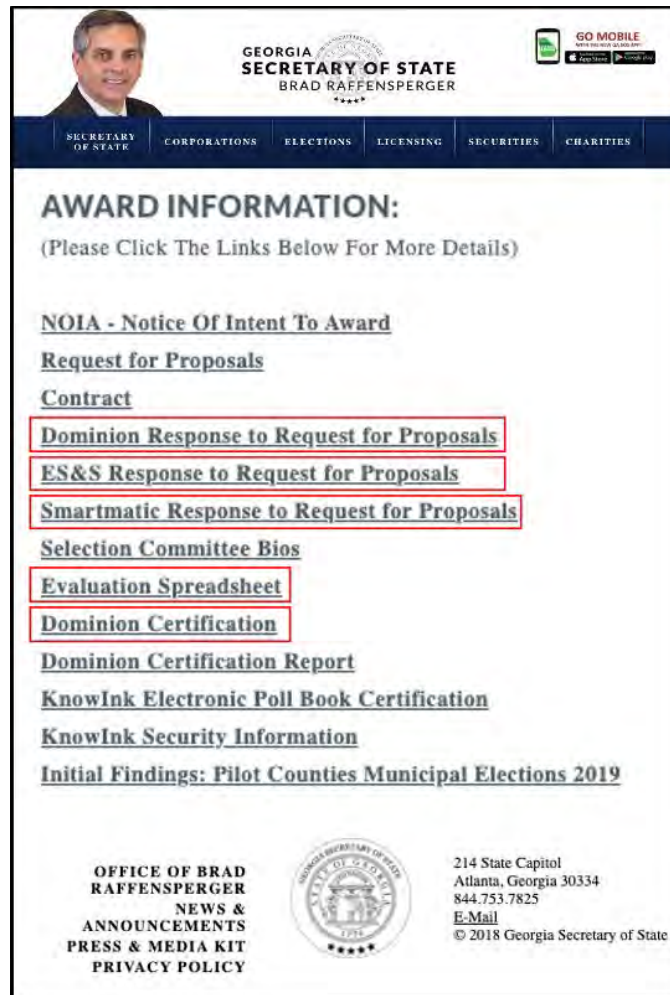
Doctored undated Secretary of State certificate attached to Powell’s complaint in Georgia	Authentic dated Secretary of State certificate publicly available online
<p>Case 1:20-cv-04809-TCB Document 1-6 Filed 11/25/20 Page 2 of 2</p>  <p>OFFICE OF SECRETARY OF STATE</p> <p><i>I, Brad Raffensperger, Secretary of State of the State of Georgia, do hereby certify that</i></p> <p>the Dominion Voting System (EAC Certification Number DVS-DemSuite5.5-A), consisting of the Democracy Suite 5.5-A Election Management System Version 5.5.12.1, EMS Adjudication Version 5.5.8.1, ImageCast X Prime (ICX BMD) Ballot Marking Device Version 5.5.10.30, ImageCast Precinct (ICP) Precinct Scanning Device Version 5.5.3-0002, and ImageCast Central (ICC) Central Scanning Device Version 5.5.3-0002, manufactured by Dominion Voting Systems, Inc., 1201 18th Street, STE 210, Denver, Colorado 80202, has been thoroughly examined and tested and found to be in compliance with the applicable provisions of the Georgia Election Code and Rules of the Secretary of State, and as a result of this inspection, it is my opinion that this kind of voting system and its components can be safely used by the electors of this state in all primaries and elections as provided in Chapter 2 of Title 21 of the Official Code of Georgia; provided however, that I hereby reserve my opinion to reexamine this voting system and its components at anytime so as to ensure that it continues to be one that can be safely used by the voters of this state.</p>	 <p>OFFICE OF SECRETARY OF STATE</p> <p><i>I, Brad Raffensperger, Secretary of State of the State of Georgia, do hereby certify that</i></p> <p>the Dominion Voting System (EAC Certification Number DVS-DemSuite5.5-A), consisting of the Democracy Suite 5.5-A Election Management System Version 5.5.12.1, EMS Adjudication Version 5.5.8.1, ImageCast X Prime (ICX BMD) Ballot Marking Device Version 5.5.10.30, ImageCast Precinct (ICP) Precinct Scanning Device Version 5.5.3-0002, and ImageCast Central (ICC) Central Scanning Device Version 5.5.3-0002, manufactured by Dominion Voting Systems, Inc., 1201 18th Street, STE 210, Denver, Colorado 80202, has been thoroughly examined and tested and found to be in compliance with the applicable provisions of the Georgia Election Code and Rules of the Secretary of State, and as a result of this inspection, it is my opinion that this kind of voting system and its components can be safely used by the electors of this state in all primaries and elections as provided in Chapter 2 of Title 21 of the Official Code of Georgia; provided however, that I hereby reserve my opinion to reexamine this voting system and its components at anytime so as to ensure that it continues to be one that can be safely used by the voters of this state.</p> <p>IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seal of my office, at the Capitol, in the City of Atlanta, this 9th day of August, in the year of our Lord Two Thousand and Nineteen and of the Independence of the United States of America the Two Hundred and Forty-Fourth</p>  <p><i>Brad Raffensperger</i> Brad Raffensperger, Secretary of State</p>

92. Upon information and belief, Powell, Wood, or someone reporting to them downloaded the authentic certificate from the Secretary of State’s website and cut off the date, seal, and signature before attaching the doctored document as an exhibit to their Georgia complaint

⁶⁰ Georgia Secretary of State, *Elections Security Is Our Top Priority: Security-Focused Tech Company, Dominion Voting to Implement New Verified Paper Ballot System*, available at, <https://sos.ga.gov/securevoting/> (Ex. 1); compare Complaint at Ex. 5, *Pearson v. Kemp*, No. 1:20-cv-04809 (N.D. Ga. Nov. 25, 2020) [Dkt. 1-6], available at, https://defendingtherepublic.org/?page_id=986 with Georgia Secretary of State, Dominion Certification (Aug. 9, 2019), available at, https://sos.ga.gov/admin/uploads/Dominion_Certification.pdf (Ex. 10).

and uploading it to Powell’s fundraising website as “evidence” supporting the bribery accusations they made during the “Stop the Steal” rally and in media appearances.

93. Other government records prove that Dominion won the Georgia contract after scoring the highest in a *competitive* bid process (not a no-bid process)—during which it competed against ES&S and Smartmatic; those records are also publicly available on the very same webpage where, upon information and belief, Powell, Wood, or someone reporting to them downloaded the dated Dominion Certification before doctoring it.⁶¹



⁶¹ Georgia Secretary of State, *Elections Security Is Our Top Priority: Security-Focused Tech Company, Dominion Voting to Implement New Verified Paper Ballot System*, available at, <https://sos.ga.gov/securevoting/> (Ex. 1).

94. Anyone downloading the Dominion Certification from the Secretary of State's website can see—in the links directly *above* it—that Dominion competed *against* Smartmatic for the Georgia contract and is thus not the same company as Smartmatic or owned by Smartmatic.

95. During her defamatory media campaign, Powell either actually knew about these readily available government records or purposefully avoided them in reckless disregard of the truth and in violation of her ethical duties as a licensed attorney.

96. Ironically, of the three companies identified on the Georgia Secretary of State's website as having submitted a bid for the Georgia contract, Dominion is the only one that has never serviced an election in Venezuela. Both Smartmatic and ES&S have serviced Venezuelan elections. But Powell targeted Dominion with her claim of Venezuelan election-rigging not because she believed it was true, but because it supported her false preconceived narrative.

Starting with the Claims of a Facially Unreliable Purported Venezuelan Military Officer, Powell Deliberately Embellished His Claims and Misrepresented the Relationship Between Dominion and Smartmatic to Support Her Defamatory Falsehoods About Dominion

97. During her defamatory media campaign, Powell has asserted that her accusations of Venezuelan election-rigging against Dominion are supported by the declaration of an anonymous purported Venezuelan military officer. There are several obvious reasons why that source is unreliable on its face, including: (1) a key portion of his declaration is nearly word-for-word identical to another declaration submitted by Powell, proving that those witnesses did not write their declarations independently; (2) his declaration has been redacted to conceal his identity and key details about his background; (3) even if he is who he purports to be, there are serious reasons to doubt the outlandish claims of someone *who worked for a dictatorship with an interest in undermining confidence in American democracy*, particularly where, as here, his claims had the potential to—and did in fact—undermine confidence in American democracy; and (4) American Trump appointees like Chris Krebs and Bill Barr—who, unlike Powell's source,

have never worked for a Venezuelan dictator—have confirmed that there was no widespread voter fraud in the 2020 election.

98. But even if one were to credit the incredible claims of the associate of a foreign dictator, even his declaration—which was attached to Powell’s court filings—does *not* actually claim that *Dominion* was created in Venezuela for the purpose of rigging elections for Hugo Chávez. Rather, his declaration makes that claim about Dominion’s competitor, *Smartmatic*. Although his declaration blithely asserts that Smartmatic software is “in the DNA” of every vote tabulating company’s software and system, it fails to provide any credentials, expertise, or factual basis whatsoever from which the declarant could possibly determine what is “in the DNA” of proprietary software he never even claims to have had access to, which is operated by multiple voting machine companies he never even claims to have worked for.⁶² As such, Powell knew or recklessly disregarded that that claim was obviously baseless and false.

99. In addition, if Powell’s anonymous purported Venezuelan military officer is in fact Leamsy Villafañá José Salazar—as has been reported by the Associated Press and the Caracas Chronicles—that would raise other serious doubts about the veracity of his declaration. After serving Hugo Chávez, Salazar worked for Diosdado Cabello, the alleged head of a Venezuelan drug cartel, before cooperating with the United States Drug Enforcement Agency. He is quoted in a 2016 book titled *Boomerang Chávez: The Fraud that Led to Venezuela’s Collapse*, which alleges that Smartmatic (not Dominion) was involved in rigging elections for Hugo Chávez in Venezuela.

⁶² Declaration of an anonymous source claiming to have been selected for the “national security guard detail of the President of Venezuela,” *Pearson v. Kemp*, No. 1:20-cv-04809 (N.D. Ga. Nov. 25, 2020) [Dkt. 1-2 at ¶ 4], available at, https://defendingtherepublic.org/?page_id=986.

100. But—unlike the declaration attached to Powell’s sham litigation—the book makes *no mention of Dominion* and identifies Salazar *by name*. This raises troubling questions about Powell’s knowledge of the falsity of her claims about Dominion and the evidence she presented in support of those claims. For example, if Salazar was already identified by name in a book alleging Venezuelan election-rigging, why was his identity redacted from the declaration attached to Powell’s court filings? And if Salazar actually believed the Smartmatic software is “in the DNA” of Dominion and every other American voting machine company, why is that explosive accusation not mentioned anywhere in the book for which he was a source? If Salazar is now a pure-hearted whistleblower with the best interests of American democracy at heart, why did he wait more than five years after arriving in the United States—until after Trump had lost the presidential election—to tell anyone that U.S. elections were being rigged through the use of decades-old Venezuelan vote-flipping software allegedly “in the DNA” of the software of all companies servicing U.S. elections? And, especially given his prior cooperation with the U.S. federal government, why did he take his allegation to Sidney Powell, rather than to Trump’s Attorney General Bill Barr or Trump’s Justice Department or Trump appointee Chris Krebs? Or perhaps he did take his allegation to them and they found it utterly lacking in credibility for all of the reasons set forth above, all of which were known to or readily knowable by Powell before she touted his allegation during her televised media tour.

101. In any event, Powell *deliberately* embellished her anonymous declarant’s obviously false accusation about Smartmatic software being “in the DNA” of Dominion’s systems, claiming, for example, that “Smartmatic owns Dominion,”⁶³ that Dominion and Smartmatic “have the same

⁶³ *The Affidavit: Sidney Powell With Lou Dobbs*, YouTube (Nov. 16, 2020), available at, https://www.youtube.com/watch?v=n_plsonhp-k (last visited Jan. 4, 2021) (Ex. 48).

history from their inception,” that “[t]here’s thousands of people in federal prison on far less evidence of criminal conduct than we have already against the Smartmatic and Dominion Systems companies,”⁶⁴ and that “[t]he flipping of votes by Dominion is even advertised in their ability to do that ... They’ve done it in Venezuela.”⁶⁵

102. These are just a few examples of instances when Powell deliberately misrepresented evidence in her possession to conflate Dominion and Smartmatic in order to tarnish Dominion with claims that had actually been made about Smartmatic. For example, Powell gave an interview on *The Sean Hannity Show* and falsely claimed, “Senator Warren and Klobuchar and some others, in December of 2019, were complaining about the Venezuelan connection and the corruption in the Dominion systems. And Carolyn Maloney was one of the congressmen who, ten years ago or so, called it out and tried to get the government not to approve its use whatsoever.”⁶⁶

103. Powell’s own court filings prove she knows those claims are false. Congresswoman Maloney’s letter (which Powell knew about because it was attached to her court filings) was not about Dominion; instead, it raised concerns that “a Venezuelan businessman” had

⁶⁴ *Sidney Powell Follows Up With Lou Dobbs About Today’s Press Briefing*, YouTube (Nov. 19, 2020), available at, <https://www.youtube.com/watch?v=X-53TpxRtxI> (last visited Jan. 4, 2021) (Ex. 49).

⁶⁵ *Powell: Election Fraud Now Obvious Because President Trump’s Landslide Victory Broke Dominion ‘Vote-Switch’ Algorithm*, OAN (Dec. 30, 2020), available at, <https://www.oann.com/powell-election-fraud-now-obvious-because-president-trumps-landslide-victory-broke-dominion-vote-switch-algorithm/> (last visited Jan. 4, 2021) (Ex. 50); *The Rush Limbaugh Show*, iHeart Radio (Dec. 29, 2020), available at, <https://www.iheart.com/podcast/1119-the-rush-limbaugh-show-57927691/episode/the-rush-limbaugh-show-podcast--75675693/> (last visited Jan. 7, 2021) (Ex. 25).

⁶⁶ *The Sean Hannity Show* with Louie Gohmert, iHeart Radio (Dec. 23, 2020), available at, <https://www.sidneypowell.com/media/listen-below-for-sidney-powells-latest-insight-into-the-fraudulent-2020-election> (last visited Jan. 4, 2021) (Ex. 51).

“a controlling interest in Smartmatic.”⁶⁷ And, far from complaining about a “Venezuelan connection” and “corruption” in Dominion’s systems or saying that Smartmatic owns Dominion, Senators Warren and Klobuchar’s letter (which Powell knew about because it was attached to her court filings) raises questions about potential vulnerabilities—not “corruption”—in Dominion’s systems, and makes clear that Dominion is majority owned by an American private equity firm—not Smartmatic or Venezuelans.⁶⁸ Far from simply raising concerns about *potential* vulnerabilities as Senators Warren and Klobuchar had done, Powell falsely accused Dominion of actually rigging the 2020 election and having been designed for that very purpose, and then *deliberately* misrepresented that the letter from Senators Warren and Klobuchar was evidence supporting her false claim.

***Powell Put Forward Conspiracy Theorists, Con Artists,
and Other Facially Unreliable Sources as Experts***

104. In order to bolster and lend credence to her false accusations about Dominion, Powell also touted “expert” witnesses who submitted declarations in support of her sham litigations, which Powell posted to her fundraising website. Powell’s so-called experts included Terpsichore Maras-Lindeman, Russell Ramsland, William Briggs, Matt Braynard, and Navid Keshavarz-Nia.

105. According to a publicly available court order, Terpsichore Maras-Lindeman is a serial liar and con artist.⁶⁹ After serving in the Navy for less than a year, Maras-Lindeman created

⁶⁷ Letter from Congresswoman Maloney to Henry M. Paulson (Oct. 6, 2006), Complaint at Ex. 24, *Pearson v. Kemp*, No. 1:20-cv-04809 (N.D. Ga. Nov. 25, 2020) [Dkt. 1-24], available at, https://defendingtherepublic.org/?page_id=986.

⁶⁸ Letter from Senator Warren, Senator Klobuchar, Senator Ron Wyden, and Congressman Mark Pocan (Dec. 6, 2019), Complaint at Ex. 26, *Pearson v. Kemp*, No. 1:20-cv-04809 (N.D. Ga. Nov. 25, 2020) [Dkt. 1-26], available at, https://defendingtherepublic.org/?page_id=986.

⁶⁹ Findings of Fact, Conclusions of Law, and Order for Judgment, *State v. Maras*, No. 51-2018-CV-01339 (Dist. Ct. N. Central Jud. Dist., N.D. Sept. 11, 2020), available at, <https://attorneygeneral.nd.gov/sites/ag/files/documents/RecentActions/2020-09-14->

a profile on Together We Served, an online veteran community, and falsely claimed an extensive military career—including that she had reached the rank of lieutenant, served in the Office of Naval Intelligence and in combat zones in the Republic of Kosovo, Afghanistan, and Iraq, and was awarded multiple medals including a Purple Heart.⁷⁰ In a recent fraud case, attorneys for the state of North Dakota said that Maras-Lindeman falsely claimed to be a doctor.⁷¹ They also said she used multiple aliases and social security numbers and created exaggerated online resumes as part of what they called “a persistent effort ... to deceive others.”⁷² They alleged that Maras-Lindeman organized a charitable event to raise funds for homeless shelters, a Catholic school, and a monument, but then used money she collected on purchases for herself at Wal-Mart, McDonald’s, QVC, and elsewhere.⁷³ A judge ordered Maras-Lindeman to pay more than \$25,000 after finding that she violated consumer protection laws by mispending money she raised and soliciting donations while misrepresenting her experience and education.⁷⁴ Powell put Maras-Lindeman’s affidavit forward as evidence without even bothering to speak to her, whether to assess her credibility or otherwise.⁷⁵ In addition, Powell either knew that she was putting forward the

[MagicCityChristmas-Judgment.pdf](#) (Ex. 52); *see also* Jon Swaine, *Powell’s secret intelligence contractor witness is a pro-Trump podcaster*, Wash. Post (Dec. 24, 2020), available at, https://www.washingtonpost.com/investigations/sidney-powells-secret-intelligence-contractor-witness-is-a-pro-trump-podcaster/2020/12/24/d5a1ab9e-4403-11eb-a277-49a6d1f9dff1_story.html (Ex. 53).

⁷⁰ LT Terpsichore Lindeman, *Together We Served*, (Mar. 5, 2020), available at, <https://web.archive.org/web/20200305152810/https%3A/navy.togetherweserved.com/usn/servlet/tws.webapp.WebApp?cmd=SBVTimeLine&type=Person&ID=506419> (Ex. 54); Ex. 53.

⁷¹ Ex. 52; *see also* Ex. 53.

⁷² *Id.*; Complaint at 26, *State v. Maras*, No. 51-2018-CV-01339 (Dist. Ct. N. Central Jud. Dist., N.D. Jul. 2, 2018) (Ex. 55).

⁷³ *Id.*

⁷⁴ Ex. 52.

⁷⁵ Ex. 53 (“Maras-Lindeman told The Post she had never spoken directly to Powell or anyone working on her legal team. She said she distributed the affidavit widely to like-minded people and was unaware it had come to Powell’s attention until it appeared as an exhibit in one of her cases.”). Powell posted Maras-Lindeman’s affidavit to her fundraising website and attached it to court

affidavit of a judicially adjudicated con artist, or Powell purposefully avoided checking the publicly available court order on the North Dakota Attorney General’s website confirming that Maras-Lindeman is exactly that.

106. Russell Ramsland is a failed Republican congressional candidate and conspiracy theorist who has publicly claimed, among other things, that George Soros helped form the “Deep State” in Nazi Germany in the 1930s—along with President George H.W. Bush’s father, the Muslim Brotherhood, and “leftists.”⁷⁶ (Mr. Soros was born in 1930.) Ramsland’s views on these points have been a matter of public record since at least 2018. As such, Powell put Ramsland forward as an expert even though she either knew he was not a reliable source, or she recklessly disregarded readily available information demonstrating that. A Delaware judge determined that Ramsland provided “materially false information” in support of his claims of vote manipulation⁷⁷ when he referenced and cited locations in Minnesota when alleging voter fraud in Michigan—something that Powell either knew or recklessly failed to verify by reference through a basic Google search.⁷⁸ Antrim County officials determined that Ramsland’s report was “riddled with

filings in her election cases in Wisconsin and Arizona. See Am. Complaint at Ex. 13, *Feehan v. Wis. Election Comm’n*, No. 20-cv-01771 (E.D. Wis. Dec. 3, 2020) [Dkt. 9-13], available at, https://defendingtherepublic.org/?page_id=1045; Complaint at Ex. 13, *Bowyer v. Ducey*, No. 20-cv-02321 (D. Ariz. Dec. 9, 2020) [Dkt. 1-5], available at, https://defendingtherepublic.org/?page_id=1036.

⁷⁶ John Savage, *Texas Tea Partiers Are Freaking Out Over ‘Deep State’ Conspiracy Theories*, Vice (Sept. 20, 2018), available at, <https://www.vice.com/en/article/mbwgxx/texas-tea-partiers-are-freaking-out-over-deep-state-conspiracy-theories> (Ex. 56).

⁷⁷ Rule to Show Cause, *Page v. Oath Inc.*, No. S20C-07-030 (Del. Super. Ct. Dec. 18, 2020).

⁷⁸ Clara Hendrickson, *Affidavit in Michigan lawsuit seeking to overturn election makes wildly inaccurate claims about vote*, PolitiFact (Dec. 4, 2020), available at, <https://www.politifact.com/factchecks/2020/dec/04/russell-james-ramsland-jr/affidavit-michigan-lawsuit-seeking-overturn-electi/> (Ex. 57).

false and unsupported claims, baseless attacks, and incorrect use of technical terms.”⁷⁹ Similarly, the former acting director of the Election Assistance Commission’s Voting System Testing and Certification program—who is actually an expert in voting systems—said that Ramsland’s report showed a “grave misunderstanding” of Antrim County’s voting system and “a lack of knowledge of election technology and process.”⁸⁰ Michigan’s Attorney General and Secretary of State issued a joint statement that Ramsland’s report was “critically flawed, filled with dramatic conclusions without any evidence to support them.”⁸¹ And, conclusively disproving Ramsland’s report, a hand recount of paper ballots in Antrim County confirmed that “Dominion’s voting machines accurately tabulated the votes cast for president in Antrim County.”⁸² Yet, even after Ramsland’s report was conclusively disproven, Powell continued to misrepresent that Ramsland was a “forensic expert” whose report was evidence supporting her false claims about Dominion.

107. William Briggs’s claims are based on a list—compiled by Matt Braynard—of allegedly ineligible Georgia voters who supposedly voted illegally. A federal judge rejected

⁷⁹ See *Report spreads debunked claims about Dominion machines in Michigan county*, Associated Press (Dec. 15, 2020), available at, <https://apnews.com/article/fact-checking-afs:Content:9847904839> (Ex. 58).

⁸⁰ See Todd Spangler, *Former election security chief for Trump knocks down Antrim County report*, The Detroit Free Press (Dec. 16, 2020), available at, <https://www.freep.com/story/news/politics/elections/2020/12/16/antrim-county-report-debunked-by-former-trump-election-official/3923499001/> (Ex. 59).

⁸¹ *AG, SOS: Plaintiff’s Report in Antrim County Election Lawsuit Demonstrates Lack of Credible Evidence in Widespread Fraud or Wrongdoing*, Michigan Dep’t of Attorney General (Dec. 14, 2020), available at, https://www.michigan.gov/ag/0,4534,7-359-92297_47203-547422--,00.html (Ex. 42).

⁸² See *Trump still wins small Michigan county after hand recount*, Associated Press (Dec. 17, 2020), available at, <https://apnews.com/article/election-2020-joe-biden-donald-trump-michigan-elections-07e52e643d682c8033a0f26b0d863387> (Ex. 15).

Briggs’s analysis and Braynard’s list—which included voters who were eligible to vote—because of its “sheer unreliability.”⁸³

108. Navid Keshavarz-Nia’s claims about the 2020 election were described by then-CISA director and Trump-appointee Chris Krebs as “nonsense.”⁸⁴ And Keshavarz-Nia declared, under penalty of perjury, that there was a pattern of improbable vote reporting in “Edison County, Michigan”—a county that does not exist in that state.

109. On information and belief, Powell knew that her purported experts were unreliable from information she possessed or purposefully avoided, from her training as an attorney, and from her experience as a former federal prosecutor.

***Powell Intentionally Disregarded Hard Evidence and Reliable Sources
Including Trump Appointees, Republicans, and Election Security Experts
Who Rebutted and Disproved Her False Accusations About Dominion***

110. Even after Powell’s false claims about Dominion rigging the election had been repeatedly, forcefully, and publicly rebutted and disproven by the hard evidence of independent audits and hand recounts of paper ballots and by reliable sources like Trump appointee Chris Krebs, Trump appointee Bill Barr, Georgia’s Republican Governor Brian Kemp, and Georgia’s Republican Secretary of State Brad Raffensperger, federal judges, and 59 election security experts, Powell intentionally disregarded the truth and continued to promote inherently improbable falsehoods about Dominion.

⁸³ Order at 26, *Bowyer v. Ducey*, No. 2-20-cv-02321 (D. Ariz. Dec. 9, 2020) [Dkt. 84]; Michelle Ye Hee Lee, *Here’s what happened when a Georgia lawmaker scrutinized the Trump campaign’s list of allegedly illegal votes*, Wash. Post (Dec. 10, 2020), available at, https://www.washingtonpost.com/politics/heres-what-happened-when-a-georgia-lawmaker-scrutinized-the-trump-campaigns-list-of-allegedly-illegal-votes/2020/12/10/1400d628-3b06-11eb-bc68-96af0daae728_story.html (Ex. 60).

⁸⁴ Zach Montellaro and Kyle Cheney, *Pro-Trump legal crusade peppered with bizarre blunders*, Politico (Dec. 3, 2020), available at, <https://www.politico.com/news/2020/12/03/sidney-powell-trump-election-lawsuit-442472> (Ex. 61).

111. While endeavoring to make the facts conform to her false preconceived narrative that the election was rigged and was the “greatest crime of the century if not the life of the world,” Powell was confronted with a number of hurdles that rendered her outlandish claims inherently improbable, if not outright impossible.⁸⁵ At each step of the way, Powell either deliberately disregarded the facts disproving her claims or invented new falsehoods to explain away the hurdles and reinforce her false preconceived narrative.

112. One hurdle was that Dominion—unlike its competitors, Smartmatic and ES&S—has never serviced a Venezuelan election at all, let alone to support Hugo Chávez. No matter. Powell attempted to overcome this hurdle by deliberately misrepresenting that Dominion was owned by Smartmatic, in order to tarnish Dominion with accusations that had actually been made about its competitor.

113. Another hurdle was that Georgia’s independent audit and hand count of 100% of the ballots conclusively disproved the falsehood that Dominion rigged the election in Georgia. When specifically asked about this at the “Stop the Steal” rally, Powell falsely claimed that “Georgia did not do a full hand recount of the ballots.”⁸⁶

114. Another hurdle rendering Powell’s claims inherently improbable: Georgia’s Republican secretary of state and governor rebutted Powell’s claims and refused to overturn Georgia’s election results. Powell’s reaction was to falsely accuse them of being in on the conspiracy.

⁸⁵ *Sidney Powell: Kraken Released in MI; Scotus Next!*, The John Fredericks Show (Dec. 14, 2020), available at, <https://www.johnfredericksradio.com/podcast/december-14-2020/>; https://www.youtube.com/watch?v=qWt1vB-OIZk&list=PL1q2i_zsupwSdYDFTH0pA-X-YNz57E5TV&index=2 (last visited Dec. 29, 2020) (Ex. 29).

⁸⁶ *Sidney Powell, Lin Wood attend ‘Stop the Steal’ rally in Georgia*, YouTube, (Dec. 2, 2020), available at, https://www.youtube.com/watch?v=pq-_B5z3QIA (last visited Jan. 4, 2021) (Ex. 44).

115. Another hurdle: Trump loyalist Attorney General Bill Barr said that U.S. attorneys and FBI agents had followed up on complaints they had received, but that there was no evidence to substantiate Powell's claims.⁸⁷ To overcome that hurdle, Powell repeatedly told televised audiences that it was "beyond my comprehension" why the government had not done more to address concerns about election integrity. And Powell's ally L. Lin Wood exhorted the crowd of Trump supporters at their televised "Stop the Steal" rally to "send that message to Bill Barr at the Justice Department, do your job ... You tell the director of the FBI, do your damn job. You work for us. Investigate this fraud."⁸⁸

116. For certain other hurdles rendering Powell's defamatory falsehoods inherently improbable, Powell simply ignored them. For example, she has not explained how a decades-old international election-rigging conspiracy involving independent testing labs accredited by the EAC and thousands of bipartisan local election volunteers could have evaded detection for so long. Nor has she explained how—if Dominion was willing and able to commit a massive fraud to deprive Trump of the presidency—Trump won the presidential election in 2016, despite the fact that Dominion machines were used in over 1,600 jurisdictions during that election.

Dominion Has Suffered Enormous Harm

117. As a result of the false accusations disseminated to a global audience by Powell, her allies, and like-minded media outlets—who acted in concert to promote a false preconceived narrative about the 2020 election, despite the total lack of evidence to support it, and despite the

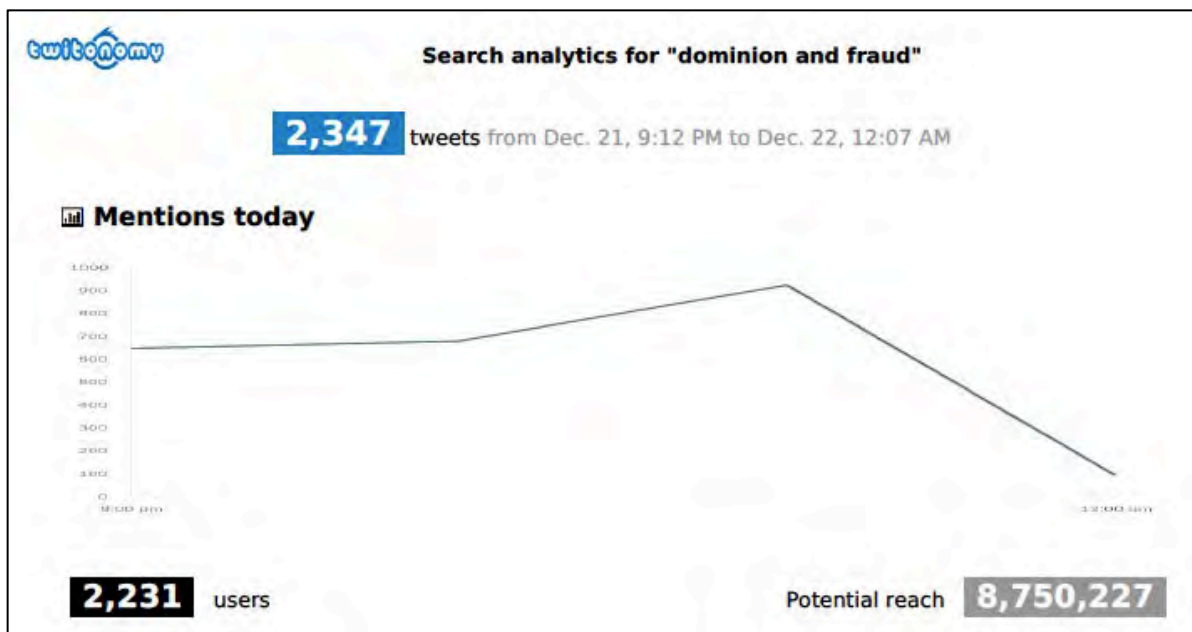
⁸⁷ Michael Balsamo, *Disputing Trump, Barr says no widespread election fraud*, Associated Press (Dec. 1, 2020), available at, <https://apnews.com/article/barr-no-widespread-election-fraud-b1f1488796c9a98c4b1a9061a6c7f49d> (Ex. 43).

⁸⁸ *Sidney Powell, Lin Wood attend 'Stop the Steal' rally in Georgia*, YouTube, (Dec. 2, 2020), available at, https://www.youtube.com/watch?v=pq-_B5z3QIA (last visited Jan. 4, 2021) (Ex. 44).

mountains of paper ballots and the army of credible sources disproving it—Dominion has suffered enormous reputational and financial harm and its employees' lives have been put in danger.

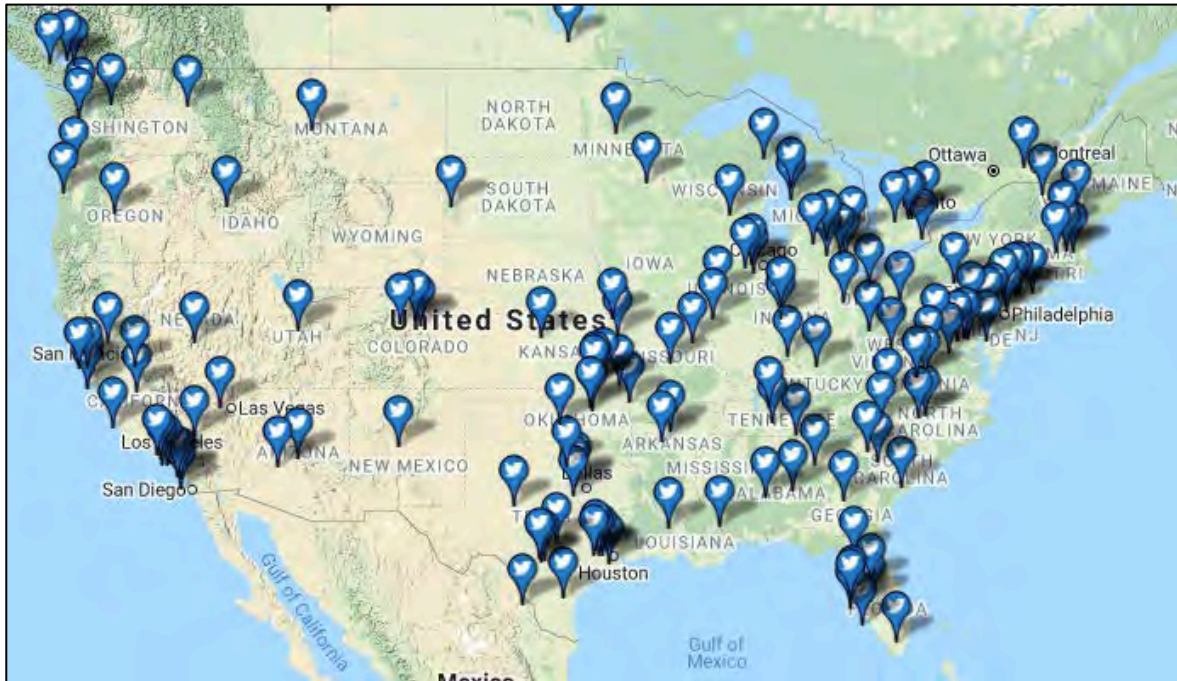
118. The disinformation campaign began to go viral after Powell's first appearance after the election on *Lou Dobbs Tonight* on November 6, 2020. The day after that appearance, "Dominion" began trending on Twitter.⁸⁹

119. That trend grew. By way of example, over a *three-hour period* on December 21, 2020, the terms "dominion" and "fraud" were tweeted out together by more than **2,200** users with over **8.75 million** total followers.



⁸⁹ *Twitter Trends on Trending words on 7th November, 2020*, Trend Calendar, available at, <https://us.trend-calendar.com/trend/2020-11-07.html> (Ex. 62).

120. Those over 2,200 Twitter users were located across the United States and in 17 countries around the world.



121. Countless media outlets and social media users foreseeably republished and disseminated the viral disinformation campaign about Dominion. By way of example only, on December 9, 2020, an internet publication called *DC Clothesline* foreseeably republished Powell’s false claims that the software in Dominion’s voting machines “was developed and financed by some of our enemies, including Venezuela,” that “Dominion machines cannot be relied on at all,” that “fraud ... happened in Georgia,” and that “the system is just as rigged as it was four weeks ago.”⁹⁰ A social media user then posted a hyperlink to the article including Powell’s false

⁹⁰ JD Heyes, *Attorney Sidney Powell drops more bombshells, says election software that rigged 2020 elections has been used for years to steal House, Senate, governor races*, DC Clothesline (Dec. 9, 2020), available at, <https://www.dcclothesline.com/2020/12/09/attorney-sidney-powell-drops-more-bombshells-says-election-software-that-rigged-2020-elections-has-been-used-for-years-to-steal-house-senate-governor-races/> (Ex. 63).

statements, and added his own commentary reflecting that he believed Powell's defamatory falsehoods, writing, "They have been stealing elections for years, using Dominion."⁹¹



⁹¹ Daniel Lynn (@daniellynn0001), Twitter (Dec. 9, 2020), available at, <https://twitter.com/daniellynn0001/status/1336723643921920001> (Ex. 64).

122. Another person foreseeably republished Powell’s defamatory falsehoods about Dominion, writing “We start with the election and Sidney Powell. She stated that this election is [t]he most corrupt election ever. And she made a lot of people aware of Dominion – Dominion comes from Venezuela...”⁹²



123. Another person who believed Powell’s defamatory falsehoods tweeted, “There has been so much fraud” including “Dominion machines moving Trump votes to Biden.”⁹³



⁹² Sofia Sjöberg (@risalusofia), Twitter (Dec. 8, 2020), available at, <https://twitter.com/risalusofia/status/1336517540059766787> (Ex. 65).

⁹³ Stephen (@Stephenwc24), Twitter (Dec. 9, 2020), available at, <https://twitter.com/Stephenwc24/status/1336732043607068673> (Ex. 66).

124. One person tweeted, “Dominion et al was created in Venezuela for Chávez & Maduro.”⁹⁴



125. Another person succinctly summarized the devastating harm that Powell has inflicted on Dominion’s commercial reputation, writing “Dominion is [a] fancy word for election fraud.”⁹⁵



⁹⁴ Bruce Robinson (@brsquared), Twitter (Dec. 9, 2020), available at, <https://twitter.com/brsquared/status/1336725318367911936> (Ex. 67).

⁹⁵ Ivo Boutros (@ivoboutros), Twitter (Dec. 8, 2020), available at, <https://twitter.com/ivoboutros/status/1336443509134548993> (Ex. 68).

126. Another person parroted Powell's false accusation that Dominion had bribed Governor Kemp, writing, "Did no one hear when Sidney Powell said there was evidence that many state governors, INCLUDING KEMP, were paid off by Dominion to allow their machines to be installed before the 2020 elections?"⁹⁶



127. Another person tweeted, "Sidney Powell ... says we will hear evidence once in court that politicians can pay Dominion to win...She said she has evidence GovKemp ensured it."⁹⁷



⁹⁶ Donna G (@DonnaG7216), Twitter (Dec. 8, 2020), available at, <https://twitter.com/DonnaG7216/status/1336477904591593472> (Ex. 69).

⁹⁷ Heathers (@NCPatriotMom), Twitter (Dec. 8, 2020), available at, <https://twitter.com/NCPatriotMom/status/1336474913658515456> (Ex. 70).

128. As reflected in polling data about decreasing confidence in the legitimacy of the 2020 election, tens of millions of people believed Powell's defamatory falsehoods about Dominion. For example, before the election, 44% of Trump supporters were "not very" or "not at all" confident in the national vote count.⁹⁸ But after the viral disinformation campaign against Dominion, 81% of Trump voters believe that voter fraud influenced the election outcome.⁹⁹

129. Among Republicans generally, 68% are concerned that the election was "rigged"¹⁰⁰ and 77% believe that "there was widespread voter fraud in the 2020 presidential election."¹⁰¹

130. As of the date of this filing, a Google search of the terms "dominion," "voting," and "fraud" yields over 8.4 million results; a search of the terms "dominion," "manipulate," and "vote" yields over 1.9 million results; a search of the terms "boycott," "dominion," and "fraud" yields over 2.8 million results; and more focused searches like "who manufactures dominion voting machines" yields over 18.9 million results, just to name a few.

131. As a result of the viral disinformation campaign against Dominion, the company and its employees have been targeted and have received calls for jail time and death threats.

⁹⁸ *A Democratic Stress Test – The 2020 Election and Its Aftermath*, Bright Line Watch (Nov. 2020), available at, <http://brightlinewatch.org/american-democracy-on-the-eve-of-the-2020-election/a-democratic-stress-test-the-2020-election-and-its-aftermathbright-line-watch-november-2020-survey/> (Ex. 71).

⁹⁹ Candice Jaimungal, *Three-quarters of voters think fraud occurred during the election*, YouGov (Nov. 12, 2020), available at, <https://today.yougov.com/topics/politics/articles-reports/2020/11/12/voters-think-fraud-occurred-during-elec> (poll available at <https://docs.cdn.yougov.com/9j7sr0my95/econTabReport.pdf>) (Ex. 72).

¹⁰⁰ Chris Kahn, *Half of Republicans say Biden won because of a 'rigged' election: Reuters/Ipsos poll*, Reuters (Nov. 18, 2020), available at, <https://www.reuters.com/article/us-usa-election-poll/half-of-republicans-say-biden-won-because-of-a-rigged-election-reuters-ipsos-poll-idUSKBN27Y1AJ> (poll available at https://www.ipsos.com/sites/default/files/ct/news/documents/2020-11/topline_reuters_post_election_survey_11_18_2020.pdf) (Ex. 73).

¹⁰¹ *60% View Joe Biden's 2020 Presidential Victory As Legitimate, Quinnipiac University National Poll Finds; 77% of Republicans Believe There Was Widespread Voter Fraud*, Quinnipiac University (Dec. 10, 2020), available at, <https://poll.qu.edu/national/release-detail?ReleaseID=3685> (Ex. 74).

132. For example, one person posted, “Why isn’t every single Dominion employee in jail for their election fraud?!!!!!!!!!!”¹⁰²



133. Another person posted, “jail dominion find them...ask allies to track them down”¹⁰³



134. One Dominion employee received text messages stating “*we are already watching you. Come clean and you will live.*”

135. One person left the following message on Dominion’s customer support line:

You’re all fucking dead, You’re all fucking dead. We’re bringing back the firing squad and you fuckers are all dead, everybody involved up against the wall you motherfuckers. We’re gonna have a fucking lottery to fucking give people a chance to shoot you motherfuckers you fucking wait you cocksuckers you commie pieces of shit. We’re going to fucking

¹⁰² Woody James (@WoodsonTJames), Twitter (Dec. 9, 2020), available at, <https://twitter.com/WoodsonTJames/status/1336726130771038208> (Ex. 75).

¹⁰³ Lionslovestrump (@leonkhanin1234), Twitter (Dec 8. 2020), available at, <https://twitter.com/leonkhanin1234/status/1336497514598555650> (Ex. 76).

kill you all you motherfuckers. After a fair trial of course you pieces of shit. The American people are fucking coming for you this is the end of your fucking line guys your fucking days are numbered you better enjoy your Thanksgiving because you'll never see another one you fucking cocksuckers. You will be gone soon. Happy Thanksgiving. Cock suckers. You're almost done just watch and see what happens. Check out the executive order from September 12, 2018. You'll see what's going to happen. You'll own nothing. You'll be on the fucking 2030 plan because you'll own nothing you fucking cocksuckers. It's coming. Buckle your fucking seatbelts. Watch what's going to happen next.

136. Another person sent a Dominion employee an email with the subject line, “*Time is up*” and with the message, “*You have 24 hours...*”

137. And another person left the following message on Dominion's main office line:

Yeah, good afternoon. Fuck you, fucking scumbags. *We're gonna blow your fucking building up.* Piece of fucking shit.

138. Because of these threats and numerous others, Dominion has made significant expenditures to protect its people from harm—including by employing on-site police and security. Since the beginning of the viral disinformation campaign, Dominion has spent more than \$565,000 on private security for the protection of its people.

139. As a direct result of the viral disinformation campaign, Dominion has been forced to make significant expenditures in an attempt to mitigate the harm to its reputation and business. To date, Dominion has incurred expenses of more than \$1,170,000 to that end.

140. Dominion is a for-profit company that generates revenue by selling voting technology services to elected officials from both political parties.

141. Just one day after Powell's Washington, D.C. press conference, Arizona state Congressman Warren Peterson tweeted "I'm drafting legislation to ban the use of Dominion software and equipment from the state of Arizona. My constituents do not trust it..."¹⁰⁴



142. Similarly, since Powell began her media blitz, state legislators in various states in which Dominion has contracts—including Florida, Louisiana, Pennsylvania, Michigan, and Pennsylvania—have stated their intent to review and reassess those contracts.

143. In calling for Georgia to abandon Dominion machines for the Georgia Senate runoff elections, in falsely accusing Georgia's Republican governor and secretary of state of accepting bribes from Dominion, and in explicitly calling upon Georgia voters to harass, intimidate, and imprison Georgia's governor—leading to death threats to Governor Kemp and Secretary Raffensperger—Powell and Wood sent a clear warning to elected officials in Georgia and elsewhere about what would happen to them if they contracted with Dominion or used Dominion machines going forward.

¹⁰⁴ Warren Petersen (@votewarren), Twitter (Nov. 20, 2020), available at, <https://twitter.com/votewarren/status/1329802399565770752> (Ex. 77).

144. As illustrated in the examples above, as a result of the viral disinformation campaign, Dominion has been unfairly subjected to the hatred, contempt, and distrust of tens of millions of American voters, and the elected officials who are Dominion's actual and potential customers have received emails, letters, and calls from their constituents demanding that they avoid contracting with Dominion or using Dominion machines. As a result, elected officials, insurers, and potential investors have been deterred from dealing with Dominion, putting Dominion's contracts in more than two dozen states and hundreds of counties and municipalities in jeopardy and significantly hampering Dominion's ability to win new contracts. Based on Dominion's historic financial track record, contract pipeline, retention and renewal rates, and new business capture rates, as well as the nature, severity, pervasiveness, and permanence of the viral disinformation campaign, current projections show lost profits of \$200 million over the next five years, when reduced to present value. In addition, the viral disinformation campaign has irreparably damaged Dominion's reputation and destroyed the resale value of a business that was worth between \$450 million and \$500 million before the viral disinformation campaign.

After Dominion Seeks a Retraction, Powell Repeatedly Doubles Down

145. On December 16, 2020, Dominion sent Powell a retraction demand letter that laid out the facts, including that, as a result of Powell's false accusations, Dominion had suffered enormous harm and its employees had been stalked, had been harassed, and had received death threats.¹⁰⁵

146. Four days later, on December 20, 2020, L. Lin Wood wrote, and also shared on Twitter, a response to a retraction request from Dominion's competitor, Smartmatic: "I represent

¹⁰⁵ Retraction Demand Letter from T. Clare and M. Meier to S. Powell (Dec. 16, 2020) (Ex. 3).

Sidney Powell. I have carefully reviewed your letter of December 15, 2020. I am not impressed.

Ms. Powell retracts nothing.”¹⁰⁶

147. Powell retweeted Wood’s tweet and added:

Same is true for #Dominion
 Heard they wrote me too!
 Haven’t seen it but retracting nothing
 We have #evidence
 They are #fraud masters!¹⁰⁷



148. Powell expected and intended to reach an audience of tens of millions when she posted that tweet. Her tweet foreseeably reached not only her 1.2 million Twitter followers (and the millions of followers of those liked or retweeted her post), but also the over 95 million Twitter followers of the 10 people she tagged in the tweet, which included Donald Trump.

149. Five days after receiving Dominion’s retraction demand, Powell published a “binder of information” to Zenger News, which Zenger News foreseeably republished with the

¹⁰⁶ Lin Wood (@LLinWood), Twitter (Dec. 20, 2020), available at, <https://twitter.com/LLinWood/status/1340729543267667970> (Ex. 78).

¹⁰⁷ Sidney Powell (@SidneyPowell1), Twitter (Dec. 20, 2020), available at, <https://twitter.com/SidneyPowell1/status/1340760761228996614> (Ex. 4).

headline “Sidney Powell’s Legal Team Has Binder of Documents She Says Establish the 2020 Election was a Fraud.”¹⁰⁸ The binder did no such thing. Instead, it repackaged already disproven and discredited reports and declarations, some of which had never been filed in court. Indeed, no documents in Powell’s binder had any references or indicia of any court filing or proceeding. Several days later, Zenger News reported that despite Powell’s claims to the contrary, she “declined to provide any new evidence of voter fraud” and the “binder of material her staff provided to Zenger News” included only “previously published claims.”¹⁰⁹ Powell added the link to the Zenger News website publishing her binder to her Kraken-Wood.com website with the caption, “READ IT: SIDNEY POWELL PUBLISHED BINDER OF ELECTION FRAUD EVIDENCE.”

150. In her media binder of “evidence,” Powell repackaged and published Ramsland’s disproven report on Antrim County, even though the publicly available facts disproving the report were included in Dominion’s retraction demand letter to Powell.

151. Powell’s media binder of “evidence” also repackaged and published the declaration of the discredited Josh Merritt—Powell’s purported “military intelligence expert” who never actually worked in military intelligence. But since Merritt had been discredited, Powell’s media binder puts his declaration forward as though it were written by someone else. Indeed, the only

¹⁰⁸ Clare Swift, *Sidney Powell’s Legal Team Has Binder of Documents She Says Establish the 2020 Election was a Fraud*, Zenger News (Dec. 23, 2020), available at, <https://www.zenger.news/sidney-powell-document-binder-2020-election-fraud/> (Ex. 79).

¹⁰⁹ David Martosko, *VIDEO: Sidney Powell Wants to Fight for Donald Trump – But His Aides Won’t Let Her, She Says*, Zenger News (Dec. 27, 2020), available at, <https://www.zenger.news/2020/12/27/video-sidney-powell-wants-to-fight-for-donald-trump-but-his-aides-wont-let-her-she-says/> (Ex. 80).

difference between the “new” declaration and Merritt’s declaration is the information about the declarant’s background; the rest of the declaration is substantively *identical to Merritt’s*.¹¹⁰

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<p>Declaration of [REDACTED] Pursuant to 28 U.S.C Section 1746, [REDACTED] make the following declaration.</p> <ol style="list-style-type: none"> 1. I am over the age of 21 years and I am under no legal disability, which would prevent me from giving this declaration. 2. I was an electronic intelligence analyst under 305th Military Intelligence with experience gathering SAM missile system electronic intelligence. I have extensive experience as a white hat hacker used by some of the top election specialists in the world. The methodologies I have employed represent industry standard cyber operation toolkits for digital forensics and OSINT, which are commonly used to certify connections between servers, network nodes and other digital properties and probe to network system vulnerabilities. 3. I am a US citizen and I reside [REDACTED] location in the United States of America. 4. Whereas the Dominion and Edison Research systems exist in the internet of things, and whereas this makes the network connections between the Dominion, Edison Research and related network nodes available for scanning. 5. And whereas Edison Research’s primary job is to report the tabulation of the count of the ballot information as received from the tabulation software, to provide to Decision HQ for election results. 6. And whereas Spiderfoot and Robtex are industry standard digital forensic tools for evaluation network security and infrastructure, these tools were used to conduct public security scans of the aforementioned Dominion and Edison Research systems. 7. A public network scan of Dominionvoting.com on 2020-11-08 revealed the following inter-relationships and revealed 13 unencrypted passwords for dominion employees, and 75 hashed passwords available in TOR nodes: 	<p style="text-align: center;">Foreign Ties and Vulnerabilities</p> <p>Declaration of [REDACTED] Pursuant to 28 U.S.C Section 1746, I [REDACTED], make the following declaration.</p> <ol style="list-style-type: none"> 1. I am over the age of 21 years and I am under no legal disability, which would prevent me from giving this declaration. 2. I served in the US Army with 2 combat deployments and left the Army under Honorable conditions. After leaving the Army I went to college and worked under a mentorship with the Late Professor Kevin Henson for 4 years after leaving the Army. In 2017 I began working at Allied Special operations group (ASOG) in Charge of Cyber Operations under the mentorship of Kevin until his passing in 2019. While at ASOG I began investigating election fraud prior to the 2018 Midterms and worked on multiple cases from Texas to Kentucky researching election fraud and vulnerabilities of the election system. It was during this time that Russ Ramsland and I notified many of these vulnerabilities from the FBI to elected officials. 3. I am a US citizen and I reside at Dallas, TX location in the United States of America. 4. Whereas the Dominion and Edison Research systems exist in the internet of things, and whereas this makes the network connections between the Dominion, Edison Research and related network nodes available for scanning. 5. And whereas Edison Research’s primary job is to report the tabulation of the count of the ballot information as received from the tabulation software, to provide to Decision HQ for election results. 6. And whereas Spiderfoot and Robtex are industry standard digital forensic tools for evaluation network security and infrastructure, these tools were used to conduct public security scans of the aforementioned Dominion and Edison Research systems. 7. A public network scan of Dominionvoting.com on 2020-11-08 revealed the following inter-relationships and revealed 13 unencrypted passwords for dominion employees, and 75 hashed passwords available in TOR nodes:

152. In her media binder of “evidence,” Powell also repackaged and published the declaration of the purported Venezuelan military officer that is not credible for the myriad reasons set forth in Dominion’s retraction demand letter to Powell and above.

153. Several days after she published her media binder to the press, Powell posted to her sidneypowell.com website a webpage titled “Evidence of Foreign Interference in the 2020 Election.”¹¹¹ That “evidence” was comprised of an “Outline,” a “Summary,” and a “Timeline”

¹¹⁰ Compare Complaint at Ex. 7, *Pearson v. Kemp*, No. 12-cv-04809 (N.D. Ga. Nov. 25, 2020) [Dkt. 1-9], available at, https://defendingtherepublic.org/?page_id=986 with *Defending the Republic, Foreign Ties Affidavit*, (Dec. 16, 2020), available at, https://defendingtherepublic.org/wp-content/uploads/2020/12/foreign_ties_affidavit.pdf (Ex. 102).

¹¹¹ Sidney Powell, *Evidence of Foreign Interference in the 2020 Election*, available at, <https://www.sidneypowell.com/evidence-of-foreign-interference> (last visited Jan. 4, 2021) (Ex. 81).

that repeated her false claims. But Powell did not include any actual evidence in those documents. In fact, the single footnote in her “evidence” publication is blank.¹¹²

154. In her “Timeline,” Powell published the knowingly false claim that “Dominion was designed to enable vote manipulation and used to keep Hugo Chávez in power” under the heading, “Affidavit of Venezuelan Whistleblower.”¹¹³

155. And in her “Summary,” Powell repeated numerous falsehoods about Dominion, including the demonstrably false claims that Dominion and Smartmatic have a “shared origin of the software code,” that “Dominion Voting Systems do not maintain a truly auditable trail for a number of reasons, among them being that its audit logs are editable by operators (and by those with unauthorized access),” that Carolyn Maloney’s letter cited “concerns about foreign influence and control over *Dominion* machines,” and that “there was a 5.6% increase in votes for one candidate for president across the entire Dominion system—with all other variables frozen.”¹¹⁴ Powell’s “Summary” also included the claims in Ramsland’s disproven report on Antrim County.

156. In the midst of publishing her binder and summaries of her already disproven and discredited accusations, Powell also doubled down and repeated her false accusations about Dominion on *The Sean Hannity Show*, *The Rush Limbaugh Show*, *FlashPoint* with Gene Bailey, an installment of the *Global Prayer for Election Integrity* series, and *The CATS Roundtable* with John Catsimatidis. During her appearance on *The Rush Limbaugh Show*, Powell solicited contributions to her fundraising website, saying it was a “non-profit that is working to help me

¹¹² See *Summary Foreign Interference Draft 12. 22. 2020* at 2 n.1, available at, <https://www.scribd.com/document/489248528/Summary> (last visited Jan. 4, 2021) (Ex. 82).

¹¹³ *Timeline*, available at, <https://www.scribd.com/document/489248529/Timeline> (last visited Jan. 4, 2021) (Ex. 83).

¹¹⁴ *Summary Foreign Interference Draft 12. 22. 2020*, available at, <https://www.scribd.com/document/489248528/Summary> (last visited Jan. 4, 2021) (Ex. 82).

defend all these cases *and to defend me* now that I'm under massive attack from the attorney general of Michigan and the City of Detroit and everything else.”¹¹⁵

157. On January 3, 2021, Powell tweeted in response to an Epoch Times article that “24,658 Trump votes were removed” and “another 12,173 switched to Biden” in “just one” Georgia county, along with the hashtags “#Dominion staff in every county” and “#Dominion shredding documents.” That tweet reached her 1.2 million followers as well as the over 1.5 million followers of the three people she tagged in the tweet.¹¹⁶



158. On January 4, 2021, Powell published her “Summary: Select Evidence of Presidential Election Fraud 2020” to her sidneypowell.com website, in which she once again

¹¹⁵ *The Rush Limbaugh Show*, iHeart Radio (Dec. 29, 2020), available at, <https://www.iheart.com/podcast/1119-the-rush-limbaugh-show-57927691/episode/the-rush-limbaugh-show-podcast--75675693/> (last visited Jan. 7, 2021) (Ex. 25).

¹¹⁶ Sidney Powell (@SidneyPowell1), Twitter (Jan. 3, 2021), available at, <https://twitter.com/SidneyPowell1/status/1345679327887843329?s=20> (Ex. 84).

repeated her demonstrable falsehoods about Dominion.¹¹⁷ In this new summary, Powell falsely stated there was “Fraud by Dominion Voting Systems” and linked to the repurposed declaration of Josh Merritt. And Powell once again republished Ramsland’s disproven claims about Dominion’s machines in Antrim County, Michigan. She concluded by urging her readers to “FLOOD social media” and to “put pressure on state and local officials” to “decertify the fraudulent vote.”

Incited by Powell’s Disinformation Campaign, a Violent Mob Storms the United States Capitol and Disrupts the Certification of the 2020 U.S. Presidential Election

159. On January 6, 2021, the United States Congress convened to certify the results of the 2020 U.S. Presidential Election.

160. During that joint session of Congress, Republican Senate Majority Leader and Trump loyalist Mitch McConnell called the claims Powell had been peddling for months “sweeping conspiracy theories”¹¹⁸ that incited doubt “without any evidence.”¹¹⁹

161. Meanwhile, a crowd was gathering outside the White House, fueled by the disinformation campaign launched and sustained by Powell in concert with her allies and like-minded media outlets.

162. At around 2:00 p.m., a mob pushed through barricades, smashed windows, broke down doors, and stormed into the halls of the United States Capitol. The Capitol was placed on lockdown, buildings were evacuated, and Congress’s certification of the election was temporarily halted.

¹¹⁷ Sidney Powell, *2020 Election Evidence Summary*, available at <https://www.sidneypowell.com/election-evidence-2020> (last visited Jan. 4, 2021) (Ex. 85).

¹¹⁸ *Senate Leaders McConnell and Schumer Remarks on Objection to Counting of Electoral College Votes*, CSPAN (Jan. 6, 2021), available at, <https://www.c-span.org/video/?c4933716/senate-leaders-mcconnell-schumer-remarks-objection-counting-electoral-college-votes> (emphasis added).

¹¹⁹ *Id.*

163. Powell remained unapologetic. She doubled down on her lies and, after plugging her Parler account, tweeted that the certification vote was “based on the most egregious fraud in the history of this almost former Republic.”¹²⁰ And even though the mob was, according to Fox News, “pro-Trump,” Powell falsely blamed “Antifa” for the mayhem that she, her allies, and like-minded media outlets had incited.



Sidney Powell’s Law Firm and Fundraising Website are Her Alter Egos

164. Sidney Powell’s law firm (Defendant Sidney Powell, P.C.) and fundraising website (Defending the Republic, Inc.) are her alter egos.

165. In each of her sham litigations, Sidney Powell signed her pleadings under Sidney Powell, P.C. Likewise, the “Of Counsel” attorneys employed by her firm signed the pleadings

¹²⁰ Sidney Powell (@SidneyPowell1), Twitter (Jan. 6, 2021), available at, <https://twitter.com/sidneypowell1/status/1346988845888200711?s=21>.

under Sidney Powell, P.C. With respect to this legal work, there is no discernable difference between Sidney Powell and Sidney Powell, P.C.

166. Likewise, the “Of Counsel” attorneys employed by Powell’s law firm sign pleadings under Sidney Powell, P.C. and Defending the Republic, Inc. Julia Haller, Brandon Johnson, and Emily Newman have been included on pleadings in at least two cases as “Of Counsel” for Sidney Powell, P.C., including Powell’s election litigation in Arizona, *Bowyer v. Ducey*, No. 2:20-cv-2321 (D. Ariz. Dec. 2, 2020), and Wisconsin, *Feehan v. Wisconsin Elections Comm’n*, No. 2:20-cv-1771 (D. Wis. Dec. 1, 2020). Haller and Newman have also appeared as “Of Counsel” for Sidney Powell, P.C. in Powell’s election litigation in Michigan, *King v. Whitmer*, No. 2:20-cv-13134 (E.D. Mich. Nov. 25, 2020).

167. Haller has also appeared and been admitted *pro hac vice* to the Northern District of Georgia in Powell’s election litigation in Georgia, *Pearson v. Kemp*, No. 1:20-cv-04809 (N.D. Ga. Dec. 1, 2020) [Dkt. 24], where Haller represented that she is employed by Powell’s fundraising website, “Defending the Republic,” which has an address in the District of Columbia.

Julia Z. Haller
 Defending the Republic
 601 Pennsylvania Ave, NW
 South Building
 Ste 900
 Washington, DC 20004
 561-888-3166
LEAD ATTORNEY
PRO HAC VICE
ATTORNEY TO BE NOTICED

168. On December 27, 2020, in a complaint filed in the Eastern District of Texas, Brandon Johnson, another “Of Counsel” attorney for Sidney Powell, P.C., and Haller further represented that they are employed by “Defending the Republic” and listed an address in the

District of Columbia. *See Gohmert et al. v. Pence*, No. 6:20-cv-660 (E.D. Tex. Dec. 27, 2020).

On January 1, 2021, Haller was admitted to the Eastern District of Texas *pro hac vice*. *Id.*

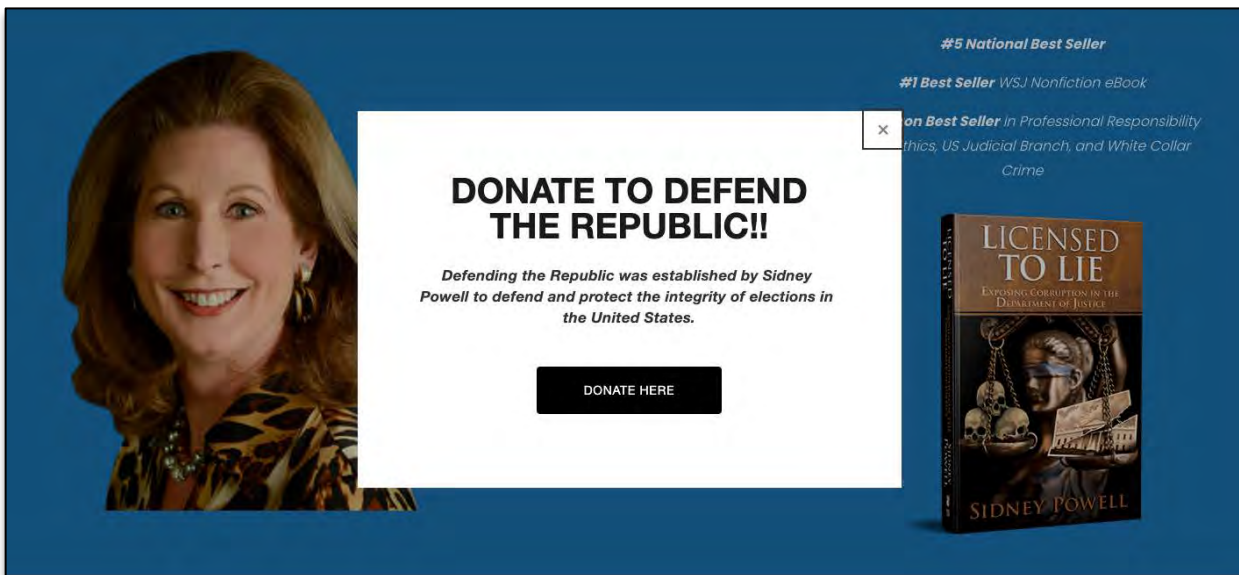
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SAM MOORHEAD, ROBERT
MONTGOMERY, LORAIN
PELLEGRINO, GREG SAFSTEN, KELLI
WARD and MICHAEL WARD**

169. During numerous media appearances, Powell solicited donations to her fundraising website by making false and defamatory statements about Dominion.¹²¹

¹²¹ *See, e.g. Sidney Powell talks about her allegations regarding the computerized voting systems on election night*, Washington Examiner (Nov. 20, 2020), available at, <https://www.washingtonexaminer.com/videos/sidney-powell-talks-about-her-allegations-regarding-the-computerized-voting-systems-on-election-night> (last visited Jan. 4, 2021) (Ex. 5); *Sidney Powell on Lou Dobbs Tonight on 11/30/20*, YouTube (Nov. 30, 2020), available at, <https://www.youtube.com/watch?v=4uMr-TRZNCw> (last visited Jan. 4, 2021) (Ex. 6); *Sidney Powell to Newsmax TV: Our Case Was Prejudged*, Newsmax (Dec. 7, 2020), available at, <https://defendingtherepublic.org/?p=1166>; <https://www.newsmax.com/newsmax-tv/sidney-powell-kraken-lawsuit-scotus/2020/12/07/id/1000459/> (last visited Jan. 4, 2021) (Ex. 26); *Evidence of Fraud: Sidney Powell and Lou Dobbs discuss*, Fox Business (Dec. 10, 2020), available at, <https://defendingtherepublic.org/?p=1168>; <https://video.foxbusiness.com/v/6215520845001/#sp=show-clips> (last visited Jan. 4, 2021) (Ex. 27); *Exclusive: Sidney Powell on 2020 Election Lawsuits, Supreme Court Decision, and the Flynn Case*, The Epoch Times (Dec. 13, 2020), available at, <https://defendingtherepublic.org/?p=1170>; https://www.theepochtimes.com/exclusive-sidney-powell-on-election-lawsuits-supreme-court-decision-and-the-flynn-case_3617067.html (last visited Jan. 4, 2021) (Ex. 28); *Sidney Powell: Kraken Released in MI; Scotus Next!*, The John Fredericks Show (Dec. 14, 2020), available at, <https://www.johnfredericksradio.com/podcast/december-14-2020/>; https://www.youtube.com/watch?v=qWt1vB-OIZk&list=PL1q2i_zsupwSdYDFTH0pA-X-YNz57E5TV&index=2 (last visited Dec. 29, 2020) (Ex. 29).

170. On information and belief, Sidney Powell operates and controls the content on sidneypowell.com, her law firm's website, federalappeals.com, and her fundraising website, defendingtherepublic.org. The websites are interconnected through at least ten different hyperlinks, wherein a user can seamlessly cross between them. Hyperlinks and "pop up" advertisements regularly divert a user from one website to another. For example, if a user visited sidneypowell.com, a white "pop up" directed the user to "DONATE HERE"—providing a link to defendingtherepublic.org.¹²²

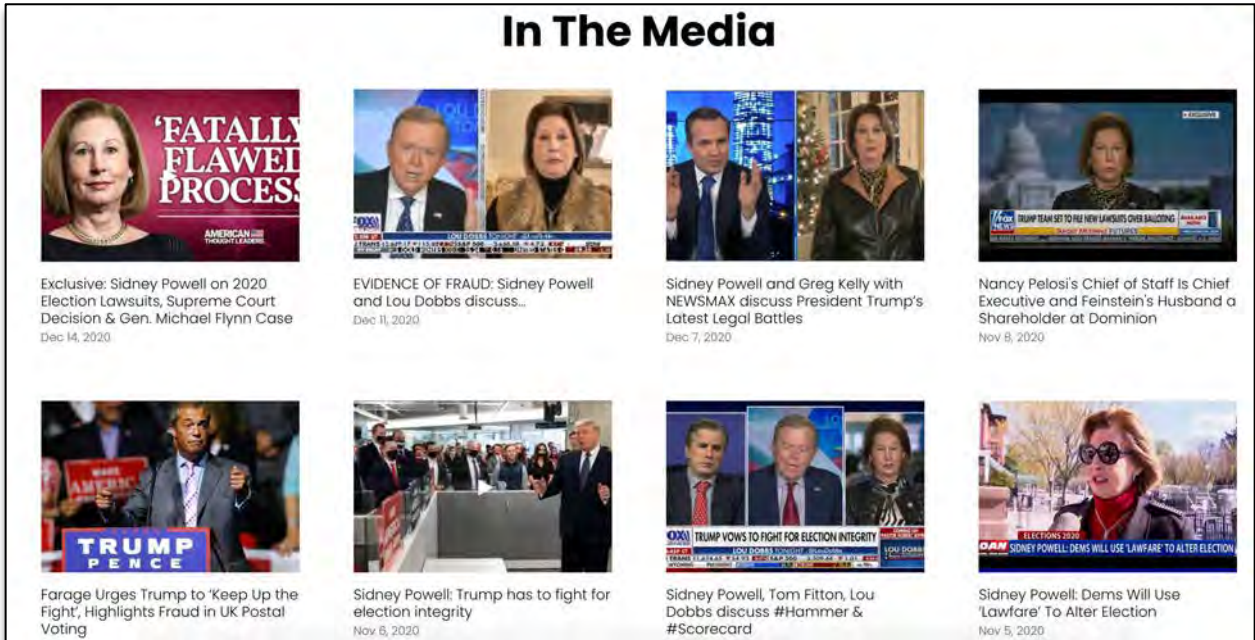


171. On November 28, 2020, the domain name helpsidneypowell.com was registered. Visitors to helpsidneypowell.com are automatically redirected to defendingtherepublic.org.

172. In addition, the websites publish and republish content such that the entities are indistinguishable from one another. For example, sidneypowell.com has a section labeled "In the Media," where video clips of Powell's media appearances are republished.¹²³

¹²² Sidney Powell (Dec. 20, 2020), available at, <https://web.archive.org/web/20201220235533/https://www.sidneypowell.com/> (Ex. 86).

¹²³ Sidney Powell, available at, <https://www.sidneypowell.com/> (last visited Jan. 7, 2021).



173. Sidneypowell.com also provided hyperlinks to legal filings signed by Sidney Powell, Sidney Powell, P.C., and the “Of Counsel” attorneys for Sidney Powell, P.C. and Defending the Republic, Inc.¹²⁴



174. Each website also prominently features a biography and headshot of Sidney Powell. Similarly, each website links to Sidney Powell’s personal website—[sidneypowell.com](https://www.sidneypowell.com). Further, [sidneypowell.com](https://www.sidneypowell.com) and [federalappeals.com](https://www.federalappeals.com) link to Powell’s personal Facebook, Twitter, Parler and YouTube page.

¹²⁴ Sidney Powell (Dec. 23, 2020), available at, <https://web.archive.org/web/20201223015943/https://www.sidneypowell.com/> (Ex. 87).

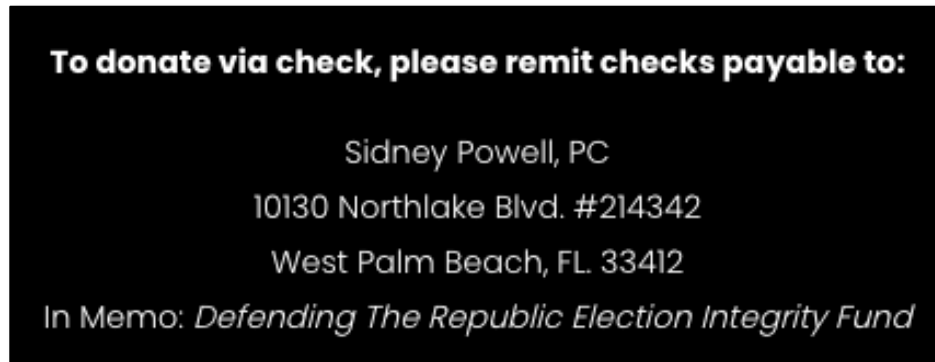
175. Sidney Powell and Sidney Powell, P.C. also utilize their websites to advertise Defending the Republic, Inc. to—and to solicit donations from—a global internet audience, including residents of the District of Columbia and Georgia. On each of the three websites, users are or were directed to “DONATE NOW,” “Donate to Defend,” and “Contribute to Defend the Republic.”¹²⁵



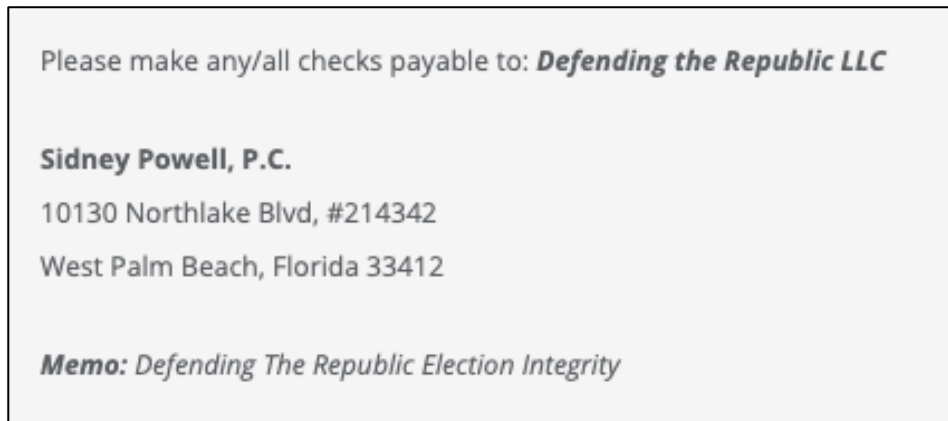
176. Visitors to any of the Defendants’ websites are or were invited to “donate,” but depending on the website or hyperlink a user follows, they are or were directed to make checks

¹²⁵ Sidney Powell (Dec. 23, 2020), available at, <https://web.archive.org/web/20201223015943/https://www.sidneypowell.com/> (Ex. 87); Sidney Powell, P.C., available at, <https://www.federalappeals.com> (last visited Jan. 7, 2021) (Ex. 89); Defending the Republic, available at, <https://defendingtherepublic.org/#donate> (last visited Jan. 7, 2021).

payable to various entities. For example, on sidneypowell.com, users were directed to make checks payable to “Sidney Powell, PC” for the “Defending the Republic Election Integrity Fund”—instead of having the checks written to Defending the Republic, Inc.¹²⁶



177. Meanwhile, on defendingtherepublic.org, donors were directed to make checks payable to Defending the Republic LLC and mail them to Sidney Powell, P.C.¹²⁷



178. There is no LLC registered in the United States with the name “Defending the Republic LLC.”

¹²⁶ Sidney Powell (Dec. 23, 2020), available at, <https://web.archive.org/web/20201223015943/https://www.sidneypowell.com/> (Ex. 87).

¹²⁷ Defending the Republic (Dec. 30, 2020), available at, <https://web.archive.org/web/2020123001629/https://defendingtherepublic.org/> (Ex. 88).

179. Upon information and belief, funds donated through any of these websites were commingled and used to bankroll Powell's sham litigations, travel to Washington, D.C., and Alpharetta, Georgia, and the defamatory media campaign giving rise to this case.

COUNT ONE – DEFAMATION *PER SE*
(Against All Defendants)

180. Dominion repeats and re-alleges each of the foregoing paragraphs as if set forth fully herein.

181. Powell made the following false and defamatory statements of fact about Dominion:

- (a) Beginning shortly after November 3, 2020, and continuing to the present day, Powell falsely claimed to members of the Trump Campaign, Donald Trump, numerous reporters, media outlets, and global audiences, in words or substance, that Dominion rigged the election by manipulating votes, that Dominion and its software were created in Venezuela to rig elections for Hugo Chávez, and that Dominion bribed Georgia's Governor and Secretary of State for a no-bid contract in Georgia. In making these false claims, Powell acted in concert with like-minded allies and media outlets that were determined to promote a false preconceived narrative about the 2020 election, and Powell expected, intended, foresaw, and facilitated the republication of her false statements to the broadest possible audience.
- (b) On November 8, 2020, from within Washington, D.C., Powell appeared on the Fox News program, *Sunday Morning Futures* with Fox News personality Maria Bartiromo, and falsely stated:

Powell: They also used an algorithm to calculate the votes they would need to flip and they used the computers to flip those votes from Trump to Biden and from other Republican candidates to their competitors also.

...

Bartiromo: We talked about the Dominion software. I know that there were voting irregularities. Tell me about that.

Powell: That's to put it mildly. The computer glitches could not and should not have happened at all. That is where the fraud took place where they were flipping votes in the computer system or adding votes that did not exist.

...

They had this all planned, Maria. They had the algorithms. ... That's when they had to stop the vote count, and go in and replace votes for Biden and take away Trump votes.¹²⁸



(c) On November 9, 2020, Powell tweeted the following false statement of fact:

It's not a "glitch." It's a feature of #Dominion designed to allow #Democrats to steal votes of #Americans.¹²⁹



(d) On November 11, 2020, Powell tweeted the following false statement of fact:

¹²⁸ *Sunday Morning Futures with Maria Bartiromo Sydney Powell ELECTION FRAUD*, Fox News (Nov. 9, 2020), available at, <https://defendingtherepublic.org/?p=1164>; <https://www.youtube.com/watch?v=g6swRH38oKs&list=PLnpxXA3HSORvJoUVwtdrX2cMum5d9I8x7&index=28> (last visited Jan. 4, 2021) (Ex. 90).

¹²⁹ Sidney Powell (@SidneyPowell1), Twitter (Nov. 9, 2020), available at, <https://twitter.com/SidneyPowell1/status/1325820207768633345?s=20> (Ex. 91).

Nefarious actors tried to steal the election from @realDonaldTrump and the Liberty loving #Patriots of this country through #Dominion voting machines.¹³⁰



- (e) On November 13, 2020, from within Washington, D.C., Powell appeared on the Fox Business program *Lou Dobbs Tonight* with Fox personality Lou Dobbs, and falsely stated:

Well, I can hardly wait to put forth all the evidence we've collected on Dominion, starting with the fact it was created to produce altered voting results in Venezuela for Hugo Chávez and then shipped internationally to manipulate votes for purchase in other countries including this one.

...

We also need to look at and we're beginning to collect evidence on the financial interest of some of the governors and secretaries of state who actually bought into the Dominion systems, surprisingly enough. Hunter-Biden-type graft to line their own pockets by getting a voting machine in that would either make sure their election was successful or they got money for their family from it.

...

People need to come forward now and get on the right side of this issue and report the fraud they know existed in Dominion voting systems because that's what it was created to do. It was its sole original purpose. It has been used all over the world to defy the will of people who wanted freedom.¹³¹

¹³⁰ Sidney Powell (@SidneyPowell1), Twitter (Nov. 11, 2020), available at, <https://twitter.com/SidneyPowell1/status/1326622101772570624?s=20> (Ex. 92).

¹³¹ *Sidney Powell with Lou Dobbs: Release the Kraken*, YouTube (Nov. 14, 2020), available at, <https://www.youtube.com/watch?v=SFCXPw1t17o> (last visited Jan. 4, 2021) (Ex. 93).



- (f) On November 15, 2020, Powell appeared on the KPTM program *America This Week* with Eric Bolling, and falsely stated:

Powell: It works through the Dominion company's votes machines that were in 30 states and does indeed alter and flip voting results.

...

Powell: It's a feature of the system that was designed with a back door so that people could watch in real time and calculate with an algorithm how many votes they needed to change to make the result they wanted to create.

...

Bolling: Dominion voting machines were in numerous states, numerous counties. There is some sort of software back door not unlike most phones will have a back door, but this will actually calculate and tell the person accessing the back door what type of voting percentages and what type of numbers are needed to change the win for a certain party, for a certain candidate?

Powell: Exactly. They can watch the voting real time. They run a computer algorithm on it as needed to either flip votes, take votes out, or alter the votes to make a candidate win.

...

Bolling: You are saying there's an actual way to change the total, the vote tallies within the system?

Powell: That's exactly right.

...

Powell: It's massive criminal voter fraud, writ large, across at least 29 states it could have been happening. Any time a voting machine was connected to the internet, and we have evidence many were, it was obviously happening. It's obvious from the algorithm and the statistics that our experts are tracking out for batches of votes and when the curves changed.¹³²



- (g) On November 15, 2020, from within Washington, D.C., Powell appeared on the Fox News program, Sunday Morning Futures with Fox News personality Maria Bartiromo, and falsely stated:

President Trump won by not just hundreds of thousands of votes but by millions of votes that were shifted by this software that was designed expressly for that purpose.

We have sworn witness testimony of why the software was designed. It was designed to rig elections.

...

It was exported internationally for profit by the people that are behind Smartmatic and Dominion. They did this on purpose. It was calculated. They've done it before. We have evidence from 2016 in California. We have so much evidence I feel like it's coming in through a fire hose.

...

This is a massive election fraud, and I'm very concerned it involved not only Dominion and its Smartmatic software but that the software

¹³² *One-on-one with Sidney Powell*, KPTM (Nov. 15, 2020), available at, <https://app.criticalmention.com/app/#clip/view/3de8b395-d807-4ba7-9855-0af62dc1a005?token=37f52d99-127d-4b48-b8dc-e5e99babfaaa> (last visited Jan. 4, 2021) (Ex. 94).

essentially was used by other election machines also. It's the software that was the problem.

...

They can put, it's like drag-and-drop, Trump votes to a separate folder and then delete that folder.

...

We've even got evidence of some kickbacks essentially.

...

We're collecting evidence now from various whistleblowers that are aware of substantial sums of money being given to family members of state officials who bought this software. I mean, we're talking about \$100 million packages for new voting machines suddenly, in multiple states, and benefits ranging from financial benefits for family members to sort of what I would call election insurance, because they know that they can win the election if they are using that software.

...

We've identified mathematically the exact algorithm they used and planned to use from the beginning to modify the votes in this case to make sure Biden won.

...

It's massive election fraud. It's going to undo the entire election.¹³³



¹³³ *Attorney Powell on election legal challenges that remain active in several states*, Fox News (Nov. 15, 2020), available at, https://video.foxnews.com/v/6209930642001?playlist_id=3386055101001#sp=show-clips (last visited Jan. 4, 2021) (Ex. 95).

- (h) On November 16, 2020, Powell appeared on *The Rush Limbaugh Show* radio show hosted by Mark Steyn, and falsely stated:

Steyn: What's the problem for you, with this Dominion Voting Systems?

Powell: Well, there are so many problems, Mark, it would be hard to articulate all of them. Their system was specifically created and designed by Venezuelan money and interests to rig elections for Hugo Chávez. And then for Maduro, it was exported internationally, understand, to rig an election in Argentina. And it has been used to rig this election for to make it appear the votes were for Mr. Biden when Donald Trump won overwhelmingly.

...

Any number of batches of votes were changed by the machine, which is by its own manual, tells people it can do that. It was changed to run 67 percent for Biden and votes were injected in that number by the hundreds of thousands, multiple times the exact same number and ratio were injected like three times in Wisconsin and twice in Michigan or vice versa. A couple of 20 minutes apart or something. ... And for people to say, 'there's no evidence of fraud,' or the people that want to cover up the fraud for whatever their personal interests are—We also have some evidence coming in that people who bought these Dominion systems for their states got special benefits on the side.

...

Steyn: You said, if I understood you correctly, that they can actually program the percentages of as it were. They can actually override whatever votes are in the machine and adjust them up and down until they reach the -- why would that be a feature of a voting machine?

Powell: Because it was created to do that to begin with. That's how Hugo Chávez and Maduro have ensured they won every Venezuelan election.

Steyn: So somehow a Canadian company wound up putting Venezuelan counting machines in 33 American states. That's the upshot of that, Sidney.

Powell: Yeah, it was all created in Venezuela and designed to do this very thing. And they've installed Venezuelan machines and then the votes actually go to Barcelona, Spain, and Frankfurt, Germany, where they can be further manipulated before they're sent back to be reported on AP and The New York Times and all that. It was caught this big this time was because Donald Trump's lead was so overwhelming, they didn't calculate the algorithm high enough.

...

You might as well call them Venezuelan machines because that's essentially what they are. ... And yes, we have Venezuelan communists influenced by Cuban communists counting our votes, and deciding how our election is going to come out.

...

There are multiple means of how they alter it. They alter it to begin with by running the algorithm where they want to run it. But they can also alter it by trashing votes, adding votes. And then if they don't like it still, then they can change it again in Barcelona.¹³⁴

- (i) On November 16, 2020, Powell appeared by telephone on Fox Business program *Lou Dobbs Tonight*, and falsely stated:

Dobbs: Dominion Voting Systems seems to be figuring larger and larger in the interest of your legal team. And, what is the latest?

Powell: Oh definitely, Lou. I've just gotten some stunning evidence from a first-hand witness, a high-ranking military officer who was present when Smartmatic was ... designed in a way that the system could change the vote of each voter without being detected. He wanted the software itself to function in such a manner that if the voter were to place their thumbprint or fingerprint on a scanner, then the thumbprint would be tied to a record of the voter's name and identity as having voted but that voter would not be tracked to the changed vote. He made it clear that the system would have to be set up but not leave any evidence of the changed vote for a specific voter and that there would be no evidence to show and nothing to contradict that the name or fingerprint or thumbprint was going with a changed vote. Smartmatic agreed to create such a system and produce the software and hardware that accomplished the result for President Chávez. After the Smartmatic Electoral Management System was put in place, he closely observed several elections where the results were manipulated with the Smartmatic software.

...

Persons controlling the vote tabulation computer had the ability to change the recording of votes by moving votes from one candidate to another by using the Smartmatic software. And Smartmatic owns Dominion.

...

¹³⁴ *The Rush Limbaugh Show*, iHeart Radio (Nov. 16, 2020), available at, <https://www.iheart.com/podcast/1119-the-rush-limbaugh-show-57927691/episode/the-rush-limbaugh-show-podcast--73947607/> (last visited Jan. 4, 2021) (Ex. 96).

And the Smartmatic software is in the DNA of every vote-tabulating company's software and systems.¹³⁵



- (j) On November 17, 2020, Powell appeared on the Newsmax program *Greg Kelly Reports*, and falsely stated:

Powell: And we know Dominion and has a long history of rigging elections. That's what it was created to do to begin with.

...

And worse than that, it had a backdoor so it could be manipulated by anyone who could access it through that backdoor and that was a deliberate feature. The affidavit of the young military officer we provided yesterday to the public explains how it was created for that very purpose so Maduro, I mean so Hugo Chávez, would never lose another election and he did not after that software was created. He won every single election and then they exported to Argentina and other countries in South America and then they brought it here.

...

We've got the evidence from mouth of the guy who founded the company. I haven't had a chance to get that out to the public yet but they admit -- the founder of the company admits he can change a million votes, no problem at all.

...

Kelly: The founder of Dominion admitted a long time ago? Recently to you? Tell us more, please.

¹³⁵ *The Affidavit: Sidney Powell With Lou Dobbs*, YouTube (Nov. 16, 2020), available at, https://www.youtube.com/watch?v=n_plsonhp-k (last visited Jan. 4, 2021) (Ex. 48).

Powell: Publicly. I will tweet out the video later and I will tag you in it.

...

The only the reason the glitches happened in the system was because he was so – had so far many more votes than they had calculated in advance, their algorithms wouldn't perform the functions they had originally performed or were set to perform. They couldn't make up the vote count, he had gotten so many hundreds of thousands more than they planned. So that's when they had to stop the counting and come up with a way to backfill the votes or destroy votes for Trump while they fabricated votes for Biden.¹³⁶



- (k) On November 19, 2020, Powell appeared at a press conference in Washington, D.C., with Giuliani and Ellis, and falsely stated:

The Dominion Voting Systems, the Smartmatic technology software and the software that goes in other computerized voting systems here as well, not just Dominion, were created in Venezuela at the direction of Hugo Chávez to make sure he never lost an election after one constitutional referendum came out the way he did not want it to come out.

...

Now, the software ... its most characteristic feature is its ability to flip votes. It can set and run an algorithm that probably ran all over the country to take a certain percentage of votes from President

¹³⁶ *Sidney Powell to Newsmax: Dominion Designed to 'Rig Elections,'* Newsmax (Nov. 17, 2020), available at, <https://www.newsmax.com/newsmax-tv/sidney-powell-dominion-voting-systems/2020/11/17/id/997526/> (last visited Dec. 4, 2020) (Ex. 30).

Trump and flip them to President Biden, which we might never have uncovered had the votes for President Trump not been so overwhelming in so many of these states that it broke the algorithm that had been plugged into the system, and that's what caused them to have to shut down in the states they shut down in.

...

One of the leaders of the Dominion project overall is Lord Malloch Brown, Mr. Soros's number two person in the U.K. and part of his organization.

...

People can admittedly go in and change whatever they want. They can set the ratio of votes from one thing to another. They can say a Biden vote counts as 1.25 and a Trump vote counts as .75. Those may be the numbers that were actually used here. It's not just the swing states that were affected. The algorithm was likely run across the country to affect the entire election.

...

There's been no oversight of Dominion or its software. Workers in each county were trained by Dominion, but there's no evidence of any monitoring otherwise. We have testimony of different workers admitting that they were trained how to dispose of Trump votes and add to Biden votes. The software has a feature pursuant to which you can drag and drop any number of batches of votes to the candidate of your choice or simply throw them away. So, we have mathematical evidence in a number of states of massive quantities of Trump votes being trashed—just simply put in the trash like you would on your computer with any file and Biden votes being injected. That's addition to the flipping. I mean, it really happens in two ways. There's an algorithm that runs that automatically flips all the votes, and then each operator has the ability to go in, override settings. They can ignore signature, they can ignore the top line of the ballot, they can go down ballot and select who they want to change results for.

...

There's evidence of different benefits being provided to the people who spent a hundred million dollars of taxpayer money at the last minute for their state to get the Dominion Voting Systems put in in time for this election in different ways. There's one person that a lawyer told me got, quote, election insurance, meaning that he would be able to make sure he was elected.

...

This is the consummate foreign interference in our election in the most criminal way you can possibly imagine.

...

We know for example one of the Dominion's highest levels employees or officers went to Detroit himself to man the Detroit operation center where he could watch the votes coming in real time and decide which file folder in the system to put those votes into. That's why you see massive spikes after hours when people were told that all of the votes were in, and all of the votes were counted.

...

There is no reasonable explanation for the up-shoots. The straight lines up. I'm not even talking about an angle, I'm talking about some massive straight lines up in the vote tallies in the middle of night after they supposedly stopped counting. And that's when the Dominion operators went in and injected votes and changed the whole system.¹³⁷



- (l) On November 19, 2020, Powell appeared by telephone on the Fox Business program Lou Dobbs Tonight, and, after being introduced as a member of Trump's legal team, falsely stated:

The fact is that the Dominion machines run the Smartmatic software or parts of the key code of it, and that is what allows them to manipulate the votes in any way the operators choose to manipulate

¹³⁷ *Trump Campaign News Conference on Legal Challenges*, CSPAN (Nov. 19, 2020), available at, <https://www.c-span.org/video/?478246-1/trump-campaign-alleges-voter-fraud-states-plans-lawsuits> (last visited Jan. 4, 2021) (Ex. 32).

them. And every time there was a glitch they called it or a connection to internet, they also violated state laws that required the machines to be recertified and nothing to be changed before the vote.

...

It could have run an automatic algorithm against all the votes which is we believe what happened originally and then the machines had to stop and the recount—or the counting had to stop in multiple places because President Trump's lead was so great at that point, they had to stop the vote counting and come in and backfill the votes they needed to change the results.

...

There's thousands of people in federal prison on far less evidence of criminal conduct than we have already against the Smartmatic and Dominion Systems companies.¹³⁸



- (m) On November 20, 2020, Powell appeared on the Fox Business program, *Mornings with Maria* with Maria Bartiromo and falsely stated:

Bartiromo: I want to first start off with your response to what Dominion says. Dominion is calling all of the allegations that you and Rudy Giuliani and Jenna Ellis have made absurd. Your response?

¹³⁸ *Sidney Powell Follows Up With Lou Dobbs About Today's Press Briefing*, YouTube (Nov. 19, 2020), available at, <https://www.youtube.com/watch?v=X-53TpxRtxI> (last visited Jan. 4, 2021) (Ex. 49).

Powell: They created this system in Venezuela for Hugo Chávez to rig the elections, and make sure he won. They sold that for that purpose to other countries and they brought it to this country for that very purpose and they've used it that way. We've got evidence that shows it.

...

Bartiromo: What about this comment from the Dominion side saying 'we have no ties to Venezuela.' What specifically are the ties to Venezuela? Dominion is saying 'we have no ties to Venezuela, no ties to Cuba.' Can you explain that?

...

Powell: ... I can tell you that the company was started with Venezuelan money in Venezuela for the express purpose of rigging elections for Hugo Chávez. We have people that were there at his side while it was all done. They were in the control room and watched how the votes were flipped they can watch the votes in real time.¹³⁹



- (n) On November 20, 2020, Powell appeared on the Washington Examiner podcast *Examining Politics* and made the following false statements:

O'Connor: I think that much of the discussion of your appearance yesterday, Sidney Powell, was centered around the charges that you made with regard to the computerized ballot system and the software. And I know, I'm not going to insult your intelligence to suggest that here on the radio, you're going to present some sort of

¹³⁹ *Sidney Powell fires back at Tucker Carlson on Maria Bartiromo morning show, Fox News*, YouTube (Nov. 20, 2020), available at, <https://www.youtube.com/watch?v=QRptwxOy8sc&t=14s> (last visited Jan. 4, 2021) (Ex. 105).

evidence that you would normally present in open court. My interest is more in what type of evidence you could produce. Is the allegation here that there is a type of backdoor in the software system and people accessed that and just created vote tallies that did not exist? ...

Powell: Their system even admits, their own training manual admits that people can go in and do that. That people can go in and put all kinds of votes in a 'trash' folder and then 'trash' them.

...

There are devices on the internet that can be used to see it, and we have multiple people who actually saw it as it was happening, and so we essentially have some pictures of it. And it is terrifying and it is a huge national security issue...

Dominion is closing its offices and moving; no doubt they're shredding documents and God only knows what else.

...

Well, you know, all they did was create a shell company in the United States, but they're completely intertwined, they share office space with one of George Soros's groups. His number 2 man heads up the operation out of England. But the money for it was all funded from Venezuela, and Cuba, and communists, and they did it. We've got an eyewitness to all of it who's has given a sworn affidavit that he saw it all done, and the purpose it was done for was to rig elections.

...

O'Connor: There was supposed to be a hearing in the state of Pennsylvania today with a representative from Dominion. They had volunteered to come in and answer questions from the state government committee overlooking these things. And at the last minute this morning, they backed out and decided that they didn't want to face the lawmakers in Pennsylvania. Have you heard about this?

Powell: Yes, I did hear about that and I'm sure they're now all hiring lawyers and everything else because they knew exactly what they were doing. They advertised these features of their machines. ... They paid kickbacks and benefits to families of public officials who bought, uh got them their government contracts.

...

What I remain just absolutely appalled about is the failure of the government to seize the Dominion machines in every state and every place. And it's not just the Dominion machines, Larry. The same

DNA code of the corrupt system is in other voting machines around the country too.

...

O'Connor: The recount was just certified. The people of Georgia, the Secretary of State there claims that, 'you know, listen, we looked at it all, we audited it all, and the paper ballots match what the computers said.' How do you respond?

Powell: That's a lie. Well, it might have. I mean, you can run the same corrupted ballots through a machine and come out with the same thing. That really doesn't prove anything. ... Not to mention the Secretary of State of Georgia and the Governor of Georgia rushed to buy, to give a \$100 million contract to Dominion, I think in 2019, which is not that long ago before the election started. ... We have one lawyer that has told me that they got essentially kickbacks and benefits for their families from doing that, not to mention what I would call election insurance, knowing that they would be elected or reelected in the process.¹⁴⁰

- (o) On November 21, 2020, Powell appeared for a telephonic interview on Newsmax with Rob Schmitt and Mark Halperin and falsely stated:

Powell: Everybody saw it election night. They saw votes being subtracted from President Trump and appearing on the Biden side of the scale and that's exactly what this Dominion system was designed to do and we have eyewitness testimony to its entire creation for that very purpose.

...

But now they can literally drag and drop hundreds of thousands of votes wherever they want them. Everybody knew when they bought the system and that was one of the features of the system.

...

We the people in voting for Trump in a landslide election had essentially broken the algorithm that had been pre-programmed into the machine. ... they just injected numbers or trashed votes for Trump otherwise and changed the numbers.

...

Mr. Kemp and the Secretary of State ... are in on the Dominion scam with their last-minute purchase and reward of a contract to

¹⁴⁰ *Sidney Powell talks about her allegations regarding the computerized voting systems on election night*, Washington Examiner (Nov. 20, 2020), available at, <https://www.washingtonexaminer.com/videos/sidney-powell-talks-about-her-allegations-regarding-the-computerized-voting-systems-on-election-night> (last visited Jan. 4, 2021) (Ex. 5).

Dominion for \$100 million. The state Bureau of Investigations for Georgia better be looking into financial benefits received by Mr. Kemp and the Secretary of State's family about that time. Another benefit Dominion was created to reward is what I would call election insurance; that's why Hugo Chávez had it created in the first place.

...

Georgia is extremely bad: we've got ... the votes being switched, the algorithms being run. You name the manner of fraud, and it occurred in Georgia.

...

Yeah, and I think the algorithm ran most probably across the country ... And it looks like 35,000 votes were added to every Democratic candidate.

....

Schmitt: You also talked about this ability of the system, and I thought this was so interesting when you said that, it could take a vote and it can make a vote for Biden worth more than a vote for Trump. Do you think that that happened or is that another part of the system that maybe wasn't used?

Powell: No, I think that definitely happened. I think that was the first step with the system. To weight the votes so that a Biden vote is worth 1.23, say, and a Trump vote is worth the rest of that. And so the Trump vote is about three-quarters and the Biden vote is one-and-a-quarter.

...

We're seeing essentially the same things in Michigan, except larger number of ballots being stuffed in. It's the old-fashioned stuffing the ballot box. They're just doing it by computer instead of by paper. That's really all it is. They're dragging and dropping files of votes from one person to another instead of just stuffing paper ballots in the ballot box.

...

I'm telling you, it's been used for both parties. One of the big problems is that we don't know who was elected by buying their election through Dominion. ... And there's no telling how many congressional candidates should have won that lost by the addition

of 35,000 votes for Democrat or the algorithm that they were running against whoever they want to target.¹⁴¹



- (p) On or before November 23, 2020, Powell published the following false statement to CBS News, intending, expecting, and reasonably foreseeing that they would publish it to their audience; CBS News did so on November 23, 2020:

I will continue to represent #WeThePeople who had their votes for Trump and other Republicans stolen by massive fraud through Dominion and Smartmatic.¹⁴²

- (q) On November 23, 2020, The Epoch Times published the following false statement after Powell had published it to The Epoch Times, intending, expecting, and reasonably foreseeing that that The Epoch Times would republish it to their audience.

Attorney Sidney Powell has also alleged that Dominion software was used to switch votes in the voting machines. Powell, in a statement, wrote, “The evidence I’m compiling is overwhelming that this software tool was used to shift millions of votes from President Trump and other Republican candidates to Biden and other Democrat candidates,” she added.¹⁴³

¹⁴¹ *Sidney Powell: It will be BIBLICAL*, Newsmax TV (Nov. 21, 2020), available at, <https://www.youtube.com/embed/Y68pEknYyCM?rel=0&start=0> (last visited Jan. 4, 2021) (Ex. 36).

¹⁴² Kathryn Watson, *Trump legal team disavows association with lawyer Sidney Powell*, CBS News (Nov. 23, 2020), available at, <https://www.cbsnews.com/news/sidney-powell-disavowed-by-trump-campaign/> (Ex. 38).

¹⁴³ Masooma Haq, *Former Republican Candidate Alleges Hard Evidence of Corruption in US Election System*, The Epoch Times (Nov. 23, 2020), available at,

- (r) On November 24, 2020, Powell appeared by telephone on the Fox Business program, *Lou Dobbs Tonight*, and falsely stated:

There's no doubt that the software was created and used in Venezuela to control the elections and make sure that Hugo Chávez was always reelected as the dictator of Venezuela in what appeared to be, quote, free and fair elections, end quote. But they were manipulated by the software used in the Dominion machines and used by other machines in the United States, frankly, and we're just continuing to be inundated by evidence of all the frauds here.¹⁴⁴



- (s) On November 28, 2020, Powell appeared via telephone on Newsmax with Tom Basile and Mark Halperin, and falsely stated:

It was designed to manipulate the votes and destroy the real votes of American citizens who were casting legal votes. That applies to Georgia as well. I have serious concerns that certain people, in fact one lawyer told me that one of his clients knew of money or benefits being paid to family members of those who signed the contract for Georgia. And I believe it was a no-bid contract that Georgia awarded for the Dominion systems, a \$100 million no bid contract.

...

We're seeing every manner and means of fraudulent voting you can possibly think of ... from the point shaving system that Dominion systems allows, they weighted votes for President Trump at .77% and they awarded votes to Biden at something like 1.22%. So

https://www.theepochtimes.com/expert-hard-evidence-of-corruption-in-us-election-system_3590417.html (Ex. 39).

¹⁴⁴ *BREAKING NEWS: Sidney Powell Tells Lou Dobbs Her Lawsuit in Georgia May Be Filed As Soon As Tomorrow*, YouTube (Nov. 24, 2020), available at, <https://www.youtube.com/watch?v=KpT2Rz4rTWM> (last visited Jan. 4, 2021) (Ex. 40).

Biden's votes were weighted an additional 20% to that of President Trump's which automatically flipped approximately 2.7% of the vote to Biden in any number of counties if not across the entire state.

...

It was designed to enable those sorts of vote flipping and switching and the ability to trash votes in large numbers so that Mr. Biden would win without campaigning.¹⁴⁵



- (t) On November 30, 2020, Powell appeared on the Fox Business program *Lou Dobbs Tonight* and falsely stated:

We need, frankly, to stop the election that's supposed to happen in January because all the machines are infected with the software code that allows Dominion to shave votes for one candidate and give them to another and other features that do the same thing.

...

The system was set up to shave and flip different votes in different states. Some people were targeted as individual candidates. It's really the most massive and historical egregious fraud the world has ever seen.

...

It seems there were significant benefits for both Governor Kemp and perhaps Mr. Raffensperger also and maybe others on their team for deciding at the last minute to rush in a contract for Dominion for \$107 million for the state.

¹⁴⁵ *Sidney Powell to Newsmax TV: Dominion Contracts Warrant Criminal Probe*, Newsmax (Dec. 28, 2020), available at, <https://www.newsmax.com/newsmax-tv/sidney-powell-georgia-lawsuit-contract/2020/11/28/id/999106/> (last visited Jan. 4, 2021) (Ex. 97).

...

Dominion and its minions and other state officials everywhere are apparently out there trying to destroy everything they can get to before we can seize it.¹⁴⁶



- (u) On December 2, 2020, Powell and Wood co-led and spoke at the “Stop the Steal” rally in Alpharetta, Georgia, where Powell falsely stated:

There was and is still massive voter fraud across this country. It took all forms, it was not just the Dominion machines. We have experts and a witness who have explained to us that the fraud exists in the DNA of all the software that was run by any voting system in the country ... I think we will eventually find that the algorithm that flipped votes at a certain percentage from Trump to Mr. Biden was run all across the country ... And then we have the extraordinary evidence of inexplicable spikes, I mean hundreds of thousands of spikes in votes. We can see them injected into the system, sometimes at a rate of 90% for Biden and 10% for Trump.

...

There should not be a run-off, certainly not on Dominion machines. I think I would encourage y’all Georgians to make it known that you will not vote at all until your vote is secure.

...

We expect that in Venezuela, unfortunately, where the Dominion systems and Smartmatic technology first took root and was used to ensure the election of Hugo Chávez, the brutal dictator.

¹⁴⁶ *Sidney Powell on Lou Dobbs Tonight on 11/30/20*, YouTube (Nov. 30, 2020), available at, <https://www.youtube.com/watch?v=4uMr-TRZNCw> (last visited Jan. 4, 2021) (Ex. 6).

...

So we need to flood the legislators here in Georgia, and the Governor and the Secretary of State with phone calls and letters.

...

[In response to a question about why Georgia's paper ballot recount did not reveal discrepancies between the number of paper ballots and the counts from the Dominion machines, Powell stated:]

Georgia did not do a full hand recount of the ballots. In the one county where they did do the hand recount, we found exactly what you're talking about. It was a small precinct. I don't remember the total number of votes but they flipped 37 from Trump to Biden in this very small precinct. It was .52 or 52% I think of the votes there. So they weighted Biden votes at 1.52 and they weighted Trump votes at .48 when the votes went into the machine to change them.

...

The machines are actually built to even try to alter the audit trail for them.

...

It's the first time it's been so blatant and that's because so many of you across the country voted for Donald Trump that you broke the algorithm.¹⁴⁷



¹⁴⁷ Sidney Powell, Lin Wood attend 'Stop the Steal' rally in Georgia, YouTube, (Dec. 2, 2020), available at, https://www.youtube.com/watch?v=pq-_B5z3QIA (last visited Jan. 4, 2021) (Ex. 44).

- (v) On December 3, 2020, Powell appeared via telephone on *The John Fredericks Show*, which was broadcast from Atlanta, Georgia, and falsely stated:

We're getting evidence of every manner and means of voter and election fraud you can imagine, but to know now that the voting machines have been rigged. And it's not just Dominion. The same DNA code is in most of the machines that run across the country, maybe not to the extent Dominion did. In fact, I saw a report yesterday that Dominion machines average 6% more for Biden than any of the others.

...

The interesting thing is the disparity between the places where Dominion is and all other places. And one of the things we know is, from prior use and testimony, that Dominion machines can flip 2.7% - 3% of the vote from Trump to Biden easily. That's kind of what they've run many times before. And that stands to reason that that accounts for the 6% up for Biden where the Dominion machines were operating.

...

We have direct witnesses who know why it was created, how it was created, watched it being used, was briefed on all its features. Their own online manual tells people they can drag and drop votes into the trash. They put them in this thing called an adjudication file, however many they want to. They can program the computer not to read signatures and therefore reject thousands of ballots. Put them in quote an adjudication file and then just trash it all. ... We have the witness who watched it all work. He was in the control room when Dominion was rigging the elections in Venezuela.

...

You don't just add 350,000 Biden votes all of a sudden at 3 o'clock in the morning. That's like flipping a coin 350,000 times and it always lands on heads. It doesn't happen. It's a mathematical and statistical impossibility...they can literally just make up a number and inject it into the system.

...

The Trump landslide was so overwhelming that it broke the algorithm.¹⁴⁸

¹⁴⁸ *Sidney Powell: "I Have Direct Evidence of Vote Fraud on the Biggest Scale in World History,"* The John Fredericks Show (Dec. 3, 2020), available at, <https://www.johnfredericksradio.com/podcast/december-3-2020/>; <https://www.youtube.com/watch?v=QKzqvtxdwfA> (last visited Jan. 3, 2021) (Ex. 98).

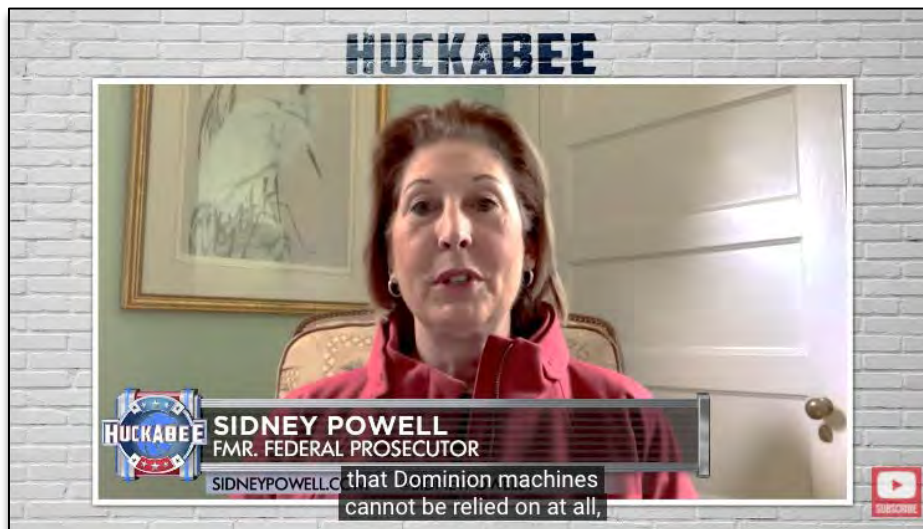


(w) On December 5, 2020, Powell appeared on *Huckabee* with Mike Huckabee and falsely stated:

The system right now is corrupt. Dominion machines cannot be relied on at all, and we want everyone, Republicans, the candidates, to stand up and speak out about the fraud that happened in Georgia.

...

We know the Dominion machines were created for the very purpose of altering the vote count to ensure the election of people like Hugo Chávez and Maduro in Venezuela. The Same thing is happening here now.¹⁴⁹



¹⁴⁹ *EXCLUSIVE: Sidney Powell Suspects CIA in RIGGING Elections*, Huckabee (Dec. 5, 2020), available at, <https://www.youtube.com/watch?v=dNK-LrrzxcE&list=PLp0iqOAbW0sZh0FqV39gW4NEwn-N0Rp0L> (Ex. 99).

- (x) On December 7, 2020, Powell appeared on Newsmax program *Greg Kelly Reports*, and falsely stated:

We focus also on the systemic problem with the Dominion machines. We have an expert who has identified that the vote for Biden was 5% overall greater where there were Dominion machines than any of the other votes. That is essentially the amount of votes you can flip, and brag about being able to flip ... these machines were created in Venezuela and the entire process was started there to make sure Mr. Chávez won every election ... This is the same technology, the same equipment. It came out of Venezuela to be used here.¹⁵⁰



¹⁵⁰ *Sidney Powell to Newsmax TV: Our Case Was Prejudged*, Newsmax (Dec. 7, 2020), available at, <https://defendingtherepublic.org/?p=1166>; <https://www.newsmax.com/newsmax-tv/sidney-powell-kraken-lawsuit-scotus/2020/12/07/id/1000459/> (last visited Jan. 4, 2021) (Ex. 26).

- (y) On December 10, 2020, Powell tweeted, in response to a tweet by Donald Trump:

The election & media were all #rigged
Your voters broke the #Dominion algorithm

...

This election fraud must be completely exposed & ended NOW 4 the world¹⁵¹



- (z) On December 10, 2020, from a hotel room at the Trump International Hotel in Washington, D.C., Powell appeared on Fox Business program *Lou Dobbs Tonight*, and falsely stated:

They designed and developed the Smartmatic and Dominion programs and machines that include a controller module that allows people to log in and manipulate the vote even as it's happening ... We're finding reams and reams of actual documents from Smartmatic and Dominion, including evidence that they planned and executed all of this. We know ... that there are George Soros connections to the entire endeavor. Lord Malloch Brown was part of it along with the other people from Dominion.

...

We have evidence of how they flipped the votes, how it was designed to flip the votes, and that all of it has been happening just as we've been saying it has been.

...

¹⁵¹ Sidney Powell (@SidneyPowell1), Twitter (Dec. 10, 2020), available at, <https://twitter.com/SidneyPowell1/status/1337251453359026183?s=20> (Ex. 45).

[t]he entire system was created for the benefit of Venezuela and Hugo Chávez to rig elections to make sure he continued winning. And then it was passed on to Mr. Maduro to do the same. And we know it was exported to other countries by virtue of some of the Dominion executives that proceeded to go about and essentially sell elections to the highest bidder.

...

And they shared office space with George Soros's companies as well as the leadership of Lord Malloch Brown in the U.K. and Canada. It is a very concerning and troubling and illegal web of conduct that all of which focused on rigging the election in this country. And we are seeing the results in multiple states where we're now identifying specific votes flipped, like in a couple of Georgia counties.¹⁵²



- (aa) On December 13, 2020, from a hotel room at the Trump International Hotel in Washington, D.C., Powell gave a televised interview to The Epoch Times program *American Thought Leaders* with Jan Jekielek, and falsely stated:

Especially insidious and troubling is the machine fraud conducted through the Dominion voting systems. In fact, one of our experts says Dominion fraud was 5 per cent higher votes for Biden across the board everywhere there was a Dominion machine running. The same was true for other Democrats that were running on the tickets in those states.

¹⁵² *Evidence of Fraud: Sidney Powell and Lou Dobbs discuss*, Fox Business (Dec. 10, 2020), available at, <https://defendingtherepublic.org/?p=1168>; <https://video.foxbusiness.com/v/6215520845001/#sp=show-clips> (last visited Jan. 4, 2021) (Ex. 27).

...

They're owned, run, and were organized and created by Venezuelan dictator, Hugo Chávez, with his dirty money and the dirty money of the Cuban communists, to ensure he had won every election after it was used.

...

President Trump's voters poured out in such great number that they broke the algorithm they had pre-programmed in the computers for Dominion to create the fraud. That's why they had to stop counting in five states.

...

Effectively what they did with the machine fraud was to, they did everything from injecting massive quantities of votes into the system that they just made up... They trashed votes. They had this thing called an adjudication system, where they could program the computer—even by their own manual they explain this—they can program the computer to reject ballots for any number of reasons. ... And then the people running the machines, the computers, could simply take that whole adjudication file that had hundreds of thousands of Trump votes in it, and drop it, trash it or flip it to Biden. And that happened all across the board.

...

Another way they did it was to shave votes. The machine can weight the ballots. So they can give Biden votes a weight of 1.25 count, and Trump votes are reduced to a 0.75 count. So they flip 25 per cent of the votes for Biden automatically, every vote count. Instead of a vote counting as one, which is all a vote should ever count as—one man, one vote. That's our standard, long held rule; the only way it can work in a democratic republic. And instead, if you voted for Biden, you got a 1.25. If you voted for Trump, you got 0.75. We can see in some of the readouts, that's exactly what happened. You can go back, the mathematicians can go back and figure out the algorithm that was run, by precinct even.

...

I mean we know that Carolyn Maloney, for example, was complaining about it—I think it was in 2006—wrote a letter to the Secretary of the Treasury, I think, and other people, expressing concern over this Venezuelan-owned company that's running American elections. ... One of the things Dominion gets people with is what I would call election insurance—'If you put in the Dominion system, you're gonna win—re-elections, no problem at all.' And that's what Hugo Chávez had it rigged for.

...

They have been doing this to American citizens and other countries around the world for at least 15 years. Venezuela hasn't had a free election since Hugo Chávez did the whole Smartmatic Dominion voting system thing.¹⁵³



- (bb) On December 14, 2020, Powell appeared on the radio program *The John Fredericks Show*, and falsely stated:

I hope things get cleaned up in Georgia fast because there's no point in voting on machines that commit fraud, and that's what the Dominion machines do. They can read the ballots, change the ballots, flip votes from Trump to Biden or from Kelly Loeffler to her opposition, they can override signatures, we have evidence that they put massive numbers in what they call an adjudication file, and by Dominion's own technical manual you can do whatever you want to with the adjudication file.

...

And Venezuela, of course, you know the system for Dominion and Smartmatic that caused this fraud came from Venezuela and was created to ensure the victories of Hugo Chávez, the dictator, and then

¹⁵³ *Exclusive: Sidney Powell on 2020 Election Lawsuits, Supreme Court Decision, and the Flynn Case*, The Epoch Times (Dec. 13, 2020), available at, <https://defendingtherepublic.org/?p=1170>; https://www.theepochtimes.com/exclusive-sidney-powell-on-election-lawsuits-supreme-court-decision-and-the-flynn-case_3617067.html (last visited Jan. 4, 2021) (Ex. 28).

of course Maduro has benefited from it. And they have sold it all over the place.

...

In fact one of our experts, and we have this evidence attached to the exhibits at sidneypowell.com, at defendingtherepublic.org, at kraken-wood.com, all of which people have attacked and tried to take down.

...

It's the greatest crime of the century if not the life of the world.

...

They've been telling everybody there's nothing wrong and that's a bald-faced lie.

...

This was rigged from the get-go, and everybody that was part of that knew it.

...

It's a 1.26 weighting. What the Dominion machines can do is instead of registering one vote for each candidate, they can go in and they can weight the votes. So, a vote for Biden counts as 1.26 points and a vote for Trump only counts as .74. So they do essentially a 25% shift in the votes that causes twice that amount in terms of a flip. It's ... just as criminal as it can possibly be.

...

[I]n terms of the Dominion machine fraud, yes, it's going to be the same everywhere and, yes, multiple states should fall because of this fraud.¹⁵⁴

¹⁵⁴ *Sidney Powell: Kraken Released in MI; Scotus Next!*, The John Fredericks Show (Dec. 14, 2020), available at, <https://www.johnfredericksradio.com/podcast/december-14-2020/>; https://www.youtube.com/watch?v=qWt1vB-OIZk&list=PL1q2i_zsupwSdYDFTH0pA-X-YNz57E5TV&index=2 (last visited Dec. 29, 2020) (Ex. 29).



(cc) On December 15, 2020, Powell tweeted the following false statements:

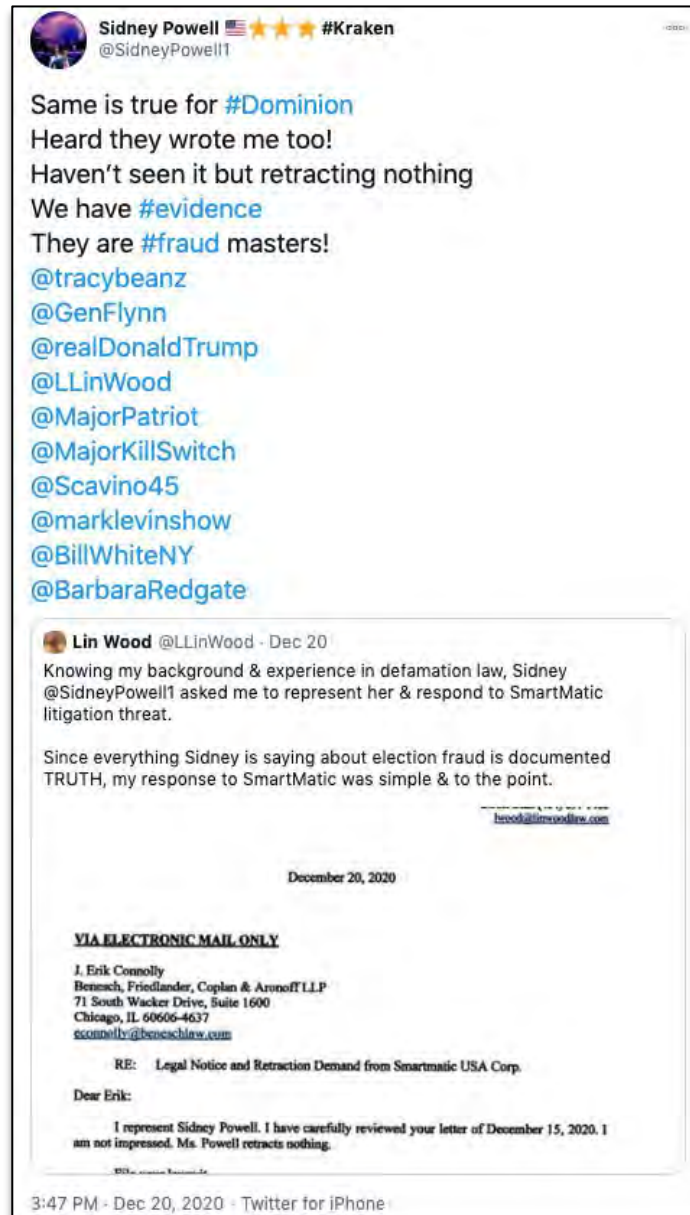
“Votes” are counted from images Dominion creates—not the ballots. The images are part of the fraud. Their error rate in Antrim county and elsewhere of over 66% reflects the algorithm pursuant to which these fraudsters shaved votes from Trump and gave them to Biden.¹⁵⁵



¹⁵⁵ Sidney Powell (@SidneyPowell1), Twitter (Dec. 15, 2020), available at, <https://twitter.com/SidneyPowell1/status/1338920555966320641?s=20> (Ex. 100).

- (dd) On December 20, 2020, four days after receiving Dominion's retraction demand letter, Powell retweeted her attorney's letter to Smartmatic saying "Ms. Powell retracts nothing," and doubled down on the truth of her false accusations against Dominion by tweeting the following false statements:

Same is true for #Dominion
 Heard they wrote me too!
 Haven't seen it but retracting nothing
 We have #evidence
 They are #fraud masters!¹⁵⁶



¹⁵⁶ Sidney Powell (@SidneyPowell1), Twitter (Dec. 20, 2020), available at, <https://twitter.com/SidneyPowell1/status/1340760761228996614> (Ex. 4).

- (ee) On December 23, 2020, Powell gave an interview on *The Sean Hannity Show* with Louie Gohmert and falsely stated:

Powell: There's stunning mathematical and statistical evidence and data that's absolutely irrefutable of massive amounts of votes just disappearing from the system in the hundreds of thousands. And we know for example that in Michigan, in Antrim County, when we actually examined the Dominion voting machines—forensic experts did that—that there were—they have this way of sending votes computer-wise to what they call adjudication, and then they can just disappear them. And they did that for more than 80% of the votes. So somebody can just drag and drop 'em to the trash file.

...

Uh, No, it has to be -- it was accessible through the Internet, and that's an automatic violation of the federal law that requires voting machines to be, you know, protected from any sort of intrusion like that. And we also know they erased certain files on the machines in Antrim County, specifically the adjudication files that would have shown exactly where they put those votes that went missing. And there is evidence from other people in other states that machines were connected from the -- to the Internet; evidence from people in multiple states that people uploaded thumb drives of information to the machine; they can inject votes and create votes from thin air. They have done that, it appears, in any number of places. This election is the biggest crime in American history.

...

We've been focused on the fraud that occurred across the country as a result of the voting machines. And I'm not just talking about Dominion; they all use the same software. And we're finding more and more evidence that they ran an algorithm in the machines that automatically flipped a certain percentage of votes from Biden—from Trump to Biden, to give Biden a 2.7% flip, which amounts to like a 5.5% edge.

...

Gohmert: But as I understand it, Smartmatic software has been incorporated into Dominion Voting Systems since 2004; was – was that your understanding?

Powell: Yes, that's my understanding.

...

Even Senator Warren and Klobuchar and some others, in December of 2019, were complaining about the Venezuelan connection and the corruption in the Dominion systems. And Carolyn Maloney was

one of the congressmen who, ten years ago or so, called it out and tried to get the government not to approve its use whatsoever.¹⁵⁷

- (ff) On December 23, 2020, from within the Trump International Hotel in Washington, D.C., Powell published a 270-page document to Zenger News for the express purpose that Zenger News would publish it, which it foreseeably did. That document included the following false statements about Dominion:

[December 13, 2020 Antrim Michigan Forensics Report]

We conclude that the Dominion Voting System is intentionally and purposefully designed with inherent errors to create systemic fraud and influence election results. The system intentionally generates an enormously high number of ballot errors. The electronic ballots are then transferred for adjudication. The intentional errors lead to bulk adjudication of ballots with no oversight, no transparency, and no audit trail. This leads to voter or election fraud. Based on our study, we conclude that The Dominion Voting System should not be used in Michigan. We further conclude that the results of Antrim County should not have been certified.

...

A staggering number of votes required adjudication. This was a 2020 issue not seen in previous election cycles still stored on the server. This is caused by intentional errors in the system. The intentional errors lead to bulk adjudication of ballots with no oversight, no transparency or audit trail. Our examination of the server logs indicates that this high error rate was incongruent with patterns from previous years. The statement attributing these issues to human error is not consistent with the forensic evaluation, which points more correctly to systemic machine and/or software errors. The systemic errors are intentionally designed to create errors in order to push a high volume of ballots to bulk adjudication.

...

The only reason to change software after the election would be to obfuscate evidence of fraud and/or to correct program errors that would de-certify the election. Our findings show that the Central Lake Township tabulator tape totals were significantly altered by utilizing two different program versions (10/23/2020 and 11/05/2020), both of which were software changes during an election which violates election law, and not just human error

¹⁵⁷ *The Sean Hannity Show* with Louie Gohmert, iHeart Radio (Dec. 23, 2020), available at, <https://www.sidneypowell.com/media/listen-below-for-sidney-powells-latest-insight-into-the-fraudulent-2020-election> (last visited Jan. 3, 2021) (Ex. 51).

associated with the Dominion Election Management System. This is clear evidence of software generated movement of votes.

...

The election logs for Antrim County consist of 15,676 total lines or events. Of the 15,676 there were a total of 10,667 critical errors/warnings or a 68.05% error rate.

...

A high “error rate” in the election software (in this case 68.05%) reflects an algorithm used that will weight one candidate greater than another (for instance, weight a specific candidate at a 2/3 to approximately 1/3 ratio). In the logs we identified that the RCV or Ranked Choice Voting Algorithm was enabled (see image below from the Dominion manual). This allows the user to apply a weighted numerical value to candidates and change the overall result. The declaration of winners can be done on a basis of points, not votes.

...

[November 15, 2020 Declaration by an Anonymous Venezuelan military officer]

This conspiracy began more than a decade ago in Venezuela and has spread to countries all over the world.

...

I was witness to the creation and operation of a sophisticated electronic voting system that permitted the leaders of the Venezuelan government to manipulate the tabulation of votes for national and local elections and select the winner of those elections in order to gain and maintain their power.

...

Importantly, I was a direct witness to the creation and operation of an electronic voting system in a conspiracy between a company known as Smartmatic and the leaders of conspiracy with the Venezuelan government. This conspiracy specifically involved President Hugo Chávez Frias, the person in charge of the National Electoral Council named Jorge Rodriguez, and principals, representatives, and personnel from Smartmatic ... The purpose of this conspiracy was to create and operate a voting system that could change the votes in elections from votes against persons running the Venezuelan government to votes in their favor in order to maintain control of the government.

...

After passage of the referendum, President Chávez instructed me to make arrangements for him to meet with Jorge Rodriguez, then President of the National Electoral Council, and three executives from Smartmatic. ... President Chávez. had multiple meetings with Rodriguez and the Smartmatic team at which I was present. In the first of four meetings, Jorge Rodriguez promoted the idea to create software that would manipulate elections. Chávez was very excited and made it clear that he would provide whatever Smartmatic needed. He wanted them immediately to create a voting system which would ensure that any time anything was going to be voted on the voting system would guarantee results that Chávez wanted. Chávez offered Smartmatic many inducements, including large sums of money, for Smartmatic to create or modify the voting system so that it would guarantee Chávez would win every election cycle. Smartmatic's team agreed to create such a system and did so.

...

I arranged and attended three more meetings between President Chávez and the representatives from Smartmatic at which details of the new voting system were discussed and agreed upon. ... At these meetings, the participants called their project the "Chávez revolution." From that point on, Chávez never lost any election. In fact, he was able to ensure wins for himself, his party, Congress persons and mayors from townships.

...

Chávez was most insistent that Smartmatic design the system in a way that the system could change the vote of each voter without being detected. ... He made it clear that the system would have to be setup to not leave any evidence of the changed vote for a specific voter and that there would be no evidence to show and nothing to contradict that the name or the fingerprint or thumb print was going with a changed vote. Smartmatic agreed to create such a system and produced the software and hardware that accomplished that result for President Chávez.

...

After the Smartmatic Electoral Management System was put in place, I closely observed several elections where the results were manipulated using Smartmatic software. One such election was in December 2006 when Chávez was running against Rosales. Chávez won with a landslide over Manuel Rosales—a margin of nearly 6 million votes for Chávez versus 3. 7 million for Rosales.

...

On April 14, 2013, I witnessed another Venezuelan national election in which the Smartmatic Electoral Management System was used to

manipulate and change the results for the person to succeed Hugo Chávez as President. In that election, Nicolas Maduro ran against Capriles Radonsky. ... Inside that location was a control room in which there were multiple digital display screens – TV screens – for results of voting in each state in Venezuela. The actual voting results were fed into that room and onto the displays over an internet feed, which was connected to a sophisticated computer system created by Smartmatic. People in that room were able to see in “real time” whether the vote that came through the electronic voting system was in their favor or against them. If one looked at any particular screen, they could determine that the vote from any specific area or as a national total was going against either candidate. Persons controlling the vote tabulation computer had the ability to change the reporting of votes by moving votes from one candidate to another by using the Smartmatic software.

...

By two o'clock in the afternoon on that election day Capriles Radonsky was ahead of Nicolas Maduro by two million votes. When Maduro and his supporters realized the size of Radonsky's lead they were worried that they were in a crisis mode and would lose the election. The Smartmatic machines used for voting in each state were connected to the internet and reported their information over the internet to the Caracas control center in real-time. So, the decision was made to reset the entire system. Maduro's and his supporters ordered the network controllers to take the internet itself offline in practically all parts in Venezuela and to change the results.

...

It took the voting system operators approximately two hours to make the adjustments in the vote from Radonsky to Maduro. Then, when they turned the internet back on and the on-line reporting was up and running again, they checked each screen state by state to be certain where they could see that each vote was changed in favor of Nicholas Maduro. At that moment the Smartmatic system changed votes that were for Capriles Radonsky to Maduro. By the time the system operators finish, they had achieved a convincing, but narrow victory of 200,000 votes for Maduro.

...

When Chávez died, Smartmatic was in a position of being the only company that could guarantee results in Venezuelan elections for the party in power.

...

I want to point out that the software and fundamental design of the electronic electoral system and software of Dominion and other

election tabulating companies relies upon software that is a descendant of the Smartmatic Electoral Management System. In short, the Smartmatic software is in the DNA of every vote tabulating company's software and system.

...

Dominion uses the same methods and fundamentally same software design for the storage, transfer and computation of voter identification data and voting data. ... The software, hardware and system have the same fundamental flaws which allow multiple opportunities to corrupt the data and mask the process in a way that the average person cannot detect any fraud or manipulation. The fact that the voting machine displays a voting result that the voter intends and then prints out a paper ballot which reflects that change does not matter. It is the software that counts the digitized vote and reports the results. The software itself is the one that changes the information electronically to the result that the operator of the software and vote counting system intends to produce that counts. That's how it is done. So the software, the software itself configures the vote and voting result -- changing the selection made by the voter. The software decides the result regardless of what the voter votes.¹⁵⁸

Sidney Powell's Legal Team Has Binder of Documents She Says Establish the 2020 Election was a Fraud



(Claire Swift/Zenger News)

Zenger News publishes the Powell binder in its entirety.

¹⁵⁸ Clare Swift, *Sidney Powell's Legal Team Has Binder of Documents She Says Establish the 2020 Election was a Fraud*, Zenger News (Dec. 23, 2020), available at, <https://www.zenger.news/sidney-powell-document-binder-2020-election-fraud/> (Ex. 79).

- (gg) On December 28, 2020, Powell published a “Summary” of “Evidence of Foreign Interference in the 2020 Election” to her website, sidneypowell.com, which included the following false statements about Dominion:

These election systems appear to have been intentionally and purposefully designed with inherent errors to create systemic fraud and influence election results.

...

The forensic report prepared for Antrim County, Michigan found that, “the Dominion Voting System is intentionally and purposefully designed with inherent errors to create systematic fraud and influence election results. For example, the report found that the system intentionally generates an enormously high number of ballot errors. The intentional errors lead to individual or bulk adjudication of ballots with no oversight, no transparency, and no audit trail. Dominion operating system has control functions to allow for transfer of adjudication files from one Results Tally system to another. This is the exact type of issue that leads to voter and/or election fraud.

...

These systems bear the same crucial code “features” and defects that allowed the same outside and foreign interference in the 2020 US General Election, in which votes were in fact altered and manipulated contrary to the will of the voters, as evidence by the forensic analysis of Antrim County MI as well as statements of citizens there who witnessed machine alteration of election results.

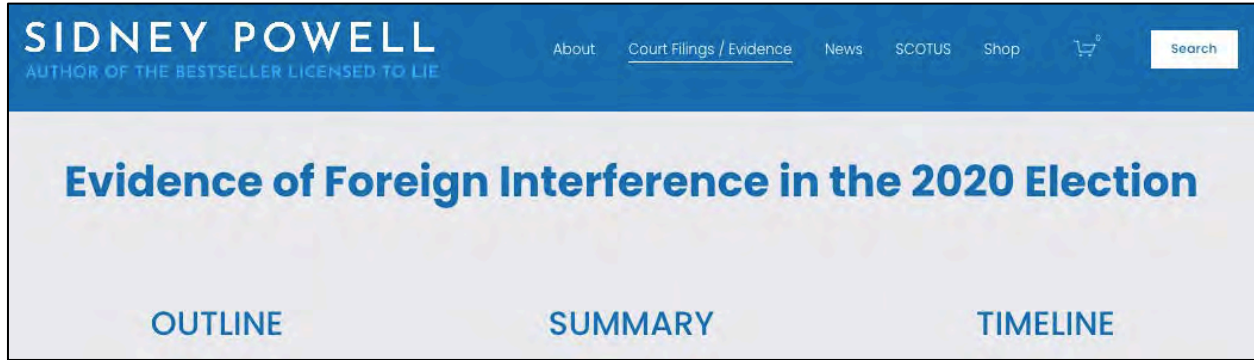
...

Dominion’s purchase of Sequoia Voting Systems from Smartmatic has resulted in the same “Source Code” being used today. Due to this and various other mergers, acquisitions, licensing agreements and partnerships, the entire election ecosystem in the United States is convoluted, murky and hidden. This began with the Venezuelan investment into Smartmatic specifically to rig elections.

...

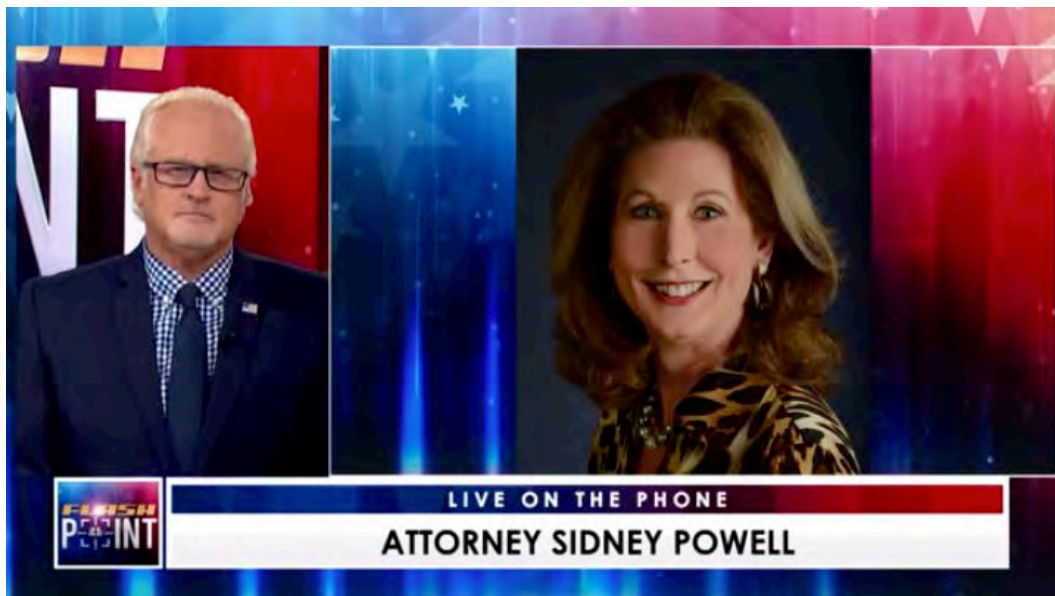
Analysis has established that there was a 5.6 % increase in votes for one candidate for president across the entire Dominion system—with all other variables frozen.¹⁵⁹

¹⁵⁹ See *Summary Foreign Interference Draft 12. 22. 2020*, available at, <https://www.scribd.com/document/489248528/Summary> (last visited Jan. 4, 2021) (Ex. 82).



(hh) On December 29, 2020, Powell gave an interview on the Victory Channel's *FlashPoint* with Gene Bailey and falsely stated:

I'm pretty sure they ran the algorithm to flip 2.7% of the votes from Trump to Biden almost everywhere across the country, certainly they did it everywhere on Dominion. ... And the vote in all the Dominion areas was 5.6% or so higher for Biden than any other areas in the country. And that would be attributable to that algorithm. ... All manner and means of fraud pervaded this election, but the most insidious and egregious of it is the machine fraud.¹⁶⁰



¹⁶⁰ *FlashPoint: Hope Is Not Lost! Featuring Attorney Sidney Powell*, (The Victory Channel broadcast Dec. 29, 2020), available at, <https://www.sidneypowell.com/media/flashpoint-hope-is-not-lost-featuring-attorney-sidney-powell> (last visited Jan. 3, 2021) (Ex. 101).

- (ii) On December 29, 2020, Powell gave a telephonic interview on *The Rush Limbaugh Show* with host Todd Hermann and made the following false statements about Dominion:

The flipping of votes by Dominion is even advertised; their ability to do that fraction, to make a Biden vote count 1.26 and a Trump vote count only .74. They've done it before. They've done it in Venezuela. They've done it in other foreign countries. They've done it in this country. We have evidence even that it was done in 2016 in California to benefit Hillary over Bernie, and it's been done in other local elections and smaller elections, different places.

...

It's absolutely the most appalling criminal operation in the history of our country.¹⁶¹

- (jj) On December 30, 2020, OAN foreseeably republished Powell's false statements from her December 29 interview on *The Rush Limbaugh Show*.¹⁶²

¹⁶¹ *The Rush Limbaugh Show*, iHeart Radio (Dec. 29, 2020), available at, <https://www.iheart.com/podcast/1119-the-rush-limbaugh-show-57927691/episode/the-rush-limbaugh-show-podcast--75675693/> (last visited Jan. 7, 2021) (Ex. 25).

¹⁶² *Powell: Election Fraud Now Obvious Because President Trump's Landslide Victory Broke Dominion 'Vote-Switch' Algorithm*, OAN (Dec. 30, 2020), available at, <https://www.oann.com/powell-election-fraud-now-obvious-because-president-trumps-landslide-victory-broke-dominion-vote-switch-algorithm/> (last visited Jan. 4, 2021) (Ex. 50).

(kk) On January 3, 2021, Powell tweeted the following false statements:

Georgia Data Shows 24,658 of Trump's Votes Removed, Another 12,173 Switched to Biden: Data Scientists
https://theepochtimes.com/georgia-election-data-shows-17650-votes-switched-from-trump-to-biden-data-scientists_3640670.html?st=P3cXX4eskG8RfE11tBFgIZHsIKUTxq2CY3_hdP90HRgXys3nzbKoYmVRr-kFoDpjGfdxNeGLpfuLgJWCzQOooWPZLVQZJyQaiBA ... via
[@epochtimes](#)

And that's just one county! HA has 159 [#Dominion](#) staff in every county [#Dominion](#) shredding documents

[@GoJackFlynn](#)

[@GenFlynn](#)

[@BoSnerdley](#)¹⁶³



¹⁶³ Sidney Powell (@SidneyPowell1), Twitter (Jan. 3, 2021), available at, <https://twitter.com/SidneyPowell1/status/1345679327887843329?s=20> (Ex. 84).

- (II) On January 3, 2021, Powell appeared on the nationally syndicated radio show *The CATS Roundtable* with John Catsimatidis and falsely stated:

Powell: This is the most fraudulent election in the history of the world. It's so well documented and so observable. Most people saw it start election night. They saw it with their own eyes. Votes don't disappear from one candidate and go to the other. Yet people saw that happen. We know it happened. We have election machines and a report done on those by experts that show that votes were flipped from Trump to Biden and how the votes were manipulated according to an algorithm.

...

Catsimatidis: Georgia, the Senate race on Tuesday; what's going to happen, do we have enough checks and balances in place?

Powell: I'm afraid we don't, John. I mean, I'm encouraging everyone to get out and vote, and break the algorithm again.

...

The adjudication file wasn't kept in Michigan for this year. It was kept for prior elections, but not for this year. And that's because it would have shown, no doubt, how Dominion people threw the ballot count from Trump to Biden.¹⁶⁴



¹⁶⁴ *Sidney Powell – Status of Presidential Election*, The CATS Roundtable (Jan. 3, 2021), available at, <https://www.sidneypowell.com/media/status-of-the-presidential-election> (last visited Jan. 3, 2021) (Ex. 103).

(mm) On January 3, 2021, Powell appeared on an installment of the *Global Prayer for Election Integrity* series, and falsely stated:

And what we've gotten this year, we've finally seen it in real-time, is an algorithm being run to shave a substantial portion of the votes so that Mr. Biden got 1.26 in many places, and a Trump vote was weighed at .74. That's absolutely outrageous. It's supposed to be one person, one vote. There should be no fractions of any votes calculated anywhere. But we're getting more and more information that the algorithm ran in lots of places, including in the red states and against red counties.

...

And then there are particular places where so many Trump people poured out to vote on election day, which is what we all encouraged them to do, to wait for election day and vote in person to make sure their vote got counted, that they broke the algorithm in all the swing states that they had pre-calculated, based on the pre-election voting. And – and that's why the voting had to count – stopped counting in multiple states that night when we saw it all happen. And then suddenly, you know, Biden votes appear.

...

So we've seen every manner and means of fraud that anybody can imagine, but it's the machine fraud that I think is the absolute most insidious.

...

We've got more information coming out about the internet connections that the Dominion machines had. We know that information was uploaded to them by thumb drive; that was impermissible. There should have been nothing changed on the machines from several days – maybe even 30 days, I can't remember the exact number before the election, until after the votes were tallied and everything properly counted and accounted for. On the machine we got access to in Antrim County, Michigan – or the machines, I should say – they found a substantial flip rate of the votes. And even worse than that, the machines were calibrated to send the vast majority of votes into what's called an adjudication file that Dominion has on their machines, that then allows an individual to decide where those votes go. Well, we're talking about hundreds of thousands of votes going in an adjudication file, I think in Fulton County, Georgia, they found that over 92 percent of the votes went into an adjudication file. That's hundreds of thousands of votes that were then all of a sudden – any number of them disappeared for Trump or reappeared as if they were Biden votes to a substantial percentage.

...

There are multiple means of fraud, but the two biggest are the false ballots that were fed into the machines after they stopped counting on election night in all the swing states – and probably other states, too – and then the embedded machine fraud.

...

I think it should be mandatory that an independent forensic audit be conducted of a number of the Dominion voting machines. And, frankly, other voting systems. It's not exclusive to Dominion. The DNA of the – of the code that can run the algorithms and – and accomplish the cheating exists in all the systems.

...

Running the same fraudulent ballots back through the same fraudulent machines is not a valid recount. And the fact that they are trying to avoid having any of the machines examined forensically in any other place in Antrim County, Michigan, tells me all I need to know to know that they are hiding massive evidence of fraud that goes a lot farther back and wider than this election.¹⁶⁵



¹⁶⁵ *Global Prayer for US Election Integrity*, Adam Schindler (Jan. 3, 2021), available at, <https://www.adamschindler.com/prayer/global-prayer-for-us-election-integrity-20/> (last visited Jan. 4, 2021) (Ex. 107).

- (nn) On January 4, 2021, Powell published to her website, sidneypowell.com, a document titled “SUMMARY: SELECT EVIDENCE OF PRESIDENTIAL ELECTION FRAUD 2020,” with the following false statements about Dominion:

Fraud by Dominion Voting Systems

...

According to the report, Dominion Voting System is intentionally and purposefully designed with inherent errors to create systemic fraud and influence election results. The system intentionally generates an enormously high number of ballot errors. The electronic ballots are then transferred for adjudication. The intentional errors lead to bulk adjudication of ballots with no oversight, no transparency, and no audit trail.¹⁶⁶



¹⁶⁶ Sidney Powell, *2020 Election Evidence Summary*, available at, <https://www.sidneypowell.com/election-evidence-2020> (last visited Jan. 4, 2021) (Ex. 85).

182. Powell's statements are reasonably understood to be statements of fact about Dominion, and were understood by people who saw, heard, and read them to be statements of fact about Dominion.

183. Powell's statements are false. Far from being created in Venezuela to rig elections for a now-deceased Venezuelan dictator, Dominion was created in Toronto, and its voting systems are certified under standards promulgated by the EAC, reviewed and tested by independent testing laboratories accredited by the EAC, and were designed to be auditable and include a paper ballot backup to verify results. Because of this backup, independent audits and hand recounts of paper ballots have conclusively and repeatedly disproven the false claim that Dominion rigged the 2020 U.S. presidential election by manipulating votes, shifting votes, installing and using an algorithm to modify or "weight" votes such that a vote for Biden counted more than a vote for Trump, trashing Trump votes, adding Biden votes, or training election workers to dispose of Trump votes and to add Biden votes. Powell does not have a video of Dominion's founder admitting he can change a million votes. Hugo Chávez's elections were not handled by Dominion, but by an entirely different company—Smartmatic—a competitor of Dominion's. Dominion was not created in or for Venezuela, has never been located there, and is not owned by Smartmatic or Venezuelans. Dominion has never provided machines or any of its software or technology to Venezuela, nor has it ever participated in any elections in Venezuela. It has no ties to the Venezuelan government, Hugo Chávez, Malloch Brown, or George Soros. Dominion does not use Smartmatic's software or machines, and there was no Smartmatic technology in any of Dominion's voting machines in the 2020 election. Dominion did not bribe or pay kickbacks to Georgia officials or their families in return for a no-bid contract to use Dominion systems in the 2020 election.

184. Powell had no applicable privilege or legal authorization to make these false and defamatory statements, or if she did, she abused it.

185. As set forth above in detail, in the course of her business as a media figure, author, and attorney, Powell published these statements with actual malice, knowing or recklessly disregarding that they are false, including by intentionally lying about having a recording that does not exist; manufacturing, misrepresenting, and cherry-picking evidence to support her false accusations; purposefully avoiding or intentionally disregarding abundant and publicly available evidence, facts, and reliable sources rebutting and disproving her false claims; espousing inherently improbable accusations; forming and sticking to a false preconceived narrative in spite of the facts; relying on and putting forward facially unreliable sources; and—when specifically put on notice of the truth and asked to retract—doubling down on and republishing her false accusations, all in furtherance of her plan to financially enrich herself, to raise her public profile, and to ingratiate herself to Donald Trump for benefits she expected to receive as a result of that association.

186. Dominion is entitled to punitive damages pursuant to O.G.C.A. Sec. 51-12-5.1 because, as set forth in detail above, there is clear and convincing evidence that Powell’s defamatory statements at the Georgia “Stop the Steal” rally—and in any other statements described in this Complaint that Powell gave from within Georgia—showed willful misconduct, malice, wantonness, and an entire want of care which raises the presumption of conscious indifference to consequences.

187. Dominion is also entitled to punitive damages under D.C. law for Powell’s defamatory statements at the Washington, D.C. press conference and other statements described in this Complaint that Powell gave from within Washington, D.C., because, as set forth in detail

above, Powell's defamatory statements were accompanied with ill will, recklessness, wantonness, willful disregard of Dominion's rights, and other circumstances tending to aggravate the injury, including but not limited to Powell repeating her defamatory falsehoods even though she knew Dominion employees were receiving death threats because of them.

188. Powell's statements are defamatory and defamatory *per se*. Powell's statements have exposed Dominion to the most extreme hatred and contempt, and Powell's accusations about Dominion have been described by those who saw, heard, and read them as "the greatest crime in the history of this country."¹⁶⁷ Powell herself called it the "greatest crime of the century if not the life of the world." She has directly accused Dominion of fraud, election rigging, bribery, and conspiracy, which are serious crimes. For Dominion—whose business is producing and providing voting systems for elections—there are no accusations that could do more to damage Dominion's business or to impugn Dominion's integrity, ethics, honesty, and financial integrity. Powell's statements were calculated to—and did in fact—provoke outrage and cause Dominion enormous harm.

189. Acting in concert with allies and media outlets that were determined to promote a false preconceived narrative about the 2020 election, Powell launched a viral disinformation campaign about Dominion that reached millions of people and caused enormous harm to Dominion. As a direct, foreseeable, and intentional result of that viral disinformation campaign, Dominion has suffered the following single and indivisible injuries: Dominion employees have been stalked, have been harassed, and have received death threats; Dominion has been forced to make an expenditure of money to remedy the defamation and to protect the lives of its employees;

¹⁶⁷ See, e.g., *Tucker Carlson Tonight*, Fox News (Nov. 21, 2020), available at, https://video.foxnews.com/v/6211375866001?playlist_id=5198073478001#sp=show-clips (last visited Jan. 4, 2021) (Ex. 104).

Dominion has lost profits; and Dominion's reputation has been irreparably damaged.

190. In view of the forgoing, Dominion is entitled to actual, presumed, punitive, and other damages in an amount to be specifically determined at trial.

COUNT TWO – DECEPTIVE TRADE PRACTICES
(Against All Defendants)

191. Dominion repeats and re-alleges each of the foregoing paragraphs as if set forth fully herein.

192. Powell's false and defamatory statements, as described in detail above, constitute deceptive trade practices in violation of Georgia law, O.C.G.A. Sec. 10-1-372(a)(8), as they disparage Dominion's goods and services by false and misleading representations of fact.

193. As alleged in detail above, despite knowing that her defamatory falsehoods about Dominion were deceptive, Powell willfully made them in the course of her business as a media figure, author, and attorney because she could derive—and did in fact derive—both direct and indirect financial benefits from making those false statements. For example, she used her defamatory falsehoods about Dominion to solicit funds to her fundraising website. She also used the defamatory accusations to garner media attention and raise her public profile, which sold additional copies of her book and drummed up additional potential clients for Powell.

194. Powell's statements have irreparably damaged Dominion and will, unless enjoined by this Court, further impair the value of Dominion's name, reputation, and goodwill.

195. Dominion is entitled to permanent injunctive relief requiring the removal of all the Defendants' statements that are determined to be false and defamatory and enjoining the Defendants from repeating such statements or engaging in any further deceptive trade practices relating to Dominion.

196. Dominion is entitled to recover from Defendants its costs of litigation, including reasonable attorneys' fees, pursuant to O.C.G.A. Sec. 10-1-373(b).

PRAYER FOR RELIEF

WHEREFORE, Dominion respectfully requests that the Court enter an award and judgment in its favor, and against all Defendants jointly and severally, as follows:

- (a) awarding Dominion compensatory damages of not less than \$651,735,000;
- (b) awarding Dominion punitive damages of not less than \$651,735,000;
- (c) awarding Dominion all expenses and costs, including attorneys' fees;
- (d) granting a narrowly tailored permanent injunction requiring the removal of all the Defendants' statements that are determined to be false and defamatory and enjoining the Defendants from repeating such statements or engaging in any further deceptive trade practices relating to Dominion; and
- (e) such other and further relief as the Court deems appropriate.

JURY DEMAND

Plaintiffs demand a trial by jury on all claims and issues so triable.

Date: January 8, 2021

/s/ Thomas A. Clare, P.C.

Thomas A. Clare, P.C. (D.C. Bar No. 461964)

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Attorneys for Plaintiffs

Exhibit 1



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SECURITY-FOCUSED TECH COMPANY, DOMINION VOTING TO IMPLEMENT NEW VERIFIED PAPER BALLOT SYSTEM

(ATLANTA) -- After a competitive selection process, the Secretary of State Brad Raffensperger selects Dominion Voting Systems to implement its new verified paper ballot system. Implementation of the new secure voting system will start immediately and be in place and fully operational for the March 24, 2020 Presidential Preference Primary. "Elections security is my top priority," said Raffensperger. "We look forward to working with national and local elections security experts to institute best practices and continue to safeguard all aspects of physical and cyber-security in an ever-changing threat environment."

The Georgia Secretary of State's office has already partnered with the Department of Homeland Security and private cyber-security companies to provide network monitoring, cyber-hygiene scanning, and cyber-security assessments. Many Georgia counties have also partnered with DHS to provide physical security assessments of their election offices.

"We are honored to partner with the State of Georgia to deliver a best-in-class system that is fully adaptable to state needs," said Dominion CEO John Poulos. "Election officials and voters alike can be assured they are using the most modern, accessible and security-focused system on the market today, with paper ballots for every vote cast to ease auditing and ensure confidence in results."

"As Election Director my job is to make sure every voter has a positive experience," said Rockdale County Elections Supervisor, Cynthia Willingham. "We are grateful to the Secretary of State for the new system and will ensure every voter is able to efficiently and accurately cast their ballot."

If you need assistance, please contact the Press Office: SosContact@sos.ga.gov.

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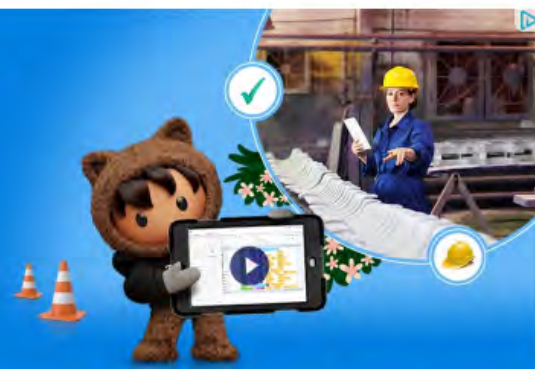
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Exhibit 2

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Sidney Powell's secret 'military intelligence expert,' key to fraud claims in election lawsuits, never worked in military intelligence



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Attorney Sidney Powell speaks at a news conference on election results in Alpharetta, Ga., on Dec. 2. (Elijah Nouvelage/Reuters)

By **Emma Brown**, **Aaron C. Davis** and **Alice Crites**

Dec. 11, 2020 at 11:29 p.m. GMT

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By **Emma Brown**, **Aaron C. Davis** and **Alice Crites**

Dec. 11, 2020 at 11:29 p.m. GMT

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The witness is code-named “[Spyder](#).” Or sometimes “[Spider](#).” His identity is so closely guarded that lawyer Sidney Powell has [sought](#) to keep it even from opposing counsel. And his account of vulnerability to international sabotage is a key part of Powell’s failing multistate effort to invalidate President-elect Joe Biden’s victory.

Powell describes Spyder in court filings as a former “Military Intelligence expert,” and his testimony is offered to support one of her central claims. In a [declaration](#) filed in four states, Spyder alleges that publicly available data about server traffic shows that voting systems in the United States were “certainly compromised by rogue actors, such as Iran and China.”

Spyder, it turns out, is Joshua Merritt, a 43-year-old information technology consultant in the Dallas area. Merritt confirmed his role as Powell’s secret witness in phone interviews this week with The Washington Post.



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Records show that Merritt is an Army veteran and that he enrolled in a training program at the 305th Military



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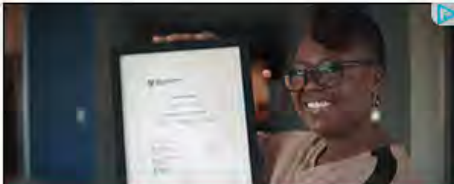
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Records show that Merritt is an Army veteran and that he enrolled in a training program at the 305th Military Intelligence Battalion, the unit he cites in his declaration. But he never completed the entry-level training course, according to Meredith Mingledorff, a spokeswoman for the U.S. Army Intelligence Center of Excellence, which includes the battalion.


“He kept washing out of courses,” said Mingledorff, citing his education records. “He’s not an intelligence analyst.”

In an interview, Merritt maintained that he graduated from the intelligence training program. But even by his own account, he was only a trainee with the 305th, at Fort Huachuca in Arizona, and for just seven months more than 15 years ago.

His separation papers, which he provided to The Post, make no mention of intelligence training. They show that he spent the bulk of his decade in the Army as a wheeled vehicle mechanic. He deployed to the wars in Iraq and Afghanistan, where he said he worked in security and route clearance. He held the rank of specialist when he was honorably discharged in 2013, having received several commendations.



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Merritt acknowledged that the declaration’s description of his work as an “electronic intelligence analyst under 305th Military Intelligence” is misleading. He said it should have made clear that his time in the 305th was as a student, not as a working intelligence expert.

He blamed “clerks” for Powell’s legal team, who he said wrote the sentence. Merritt said he had not read it carefully before he signed his name swearing it was true.

“That was one thing I was trying to backtrack on,” he said on Thursday. “My original paperwork that I sent in didn’t say that.”

On Friday afternoon, as his name increasingly circulated on social media, Merritt said he had decided to remove himself from the legal effort altogether. He said he plans to close his business and relocate with his family.

Asked about Merritt’s limited experience in military intelligence, Powell said in a text to The Post: “I cannot confirm that Joshua Merritt is even Spider. Strongly encourage you not to print.”

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Of her description of him as a military intelligence expert, she said, "If we made a mistake, we will correct it."

Federal judges have in the past week rejected all four of the complaints Powell has filed seeking to overturn the presidential election — lawsuits popularly known as the "kraken" suits, after a mythical sea creature she has harnessed as a sort of mascot — ruling either that the challenges should have been filed in state courts or were meritless.

In Michigan, attorneys for the state argued that Powell's complaint was based on "fantastical conspiracy theories" that belong in the "fact-free outer reaches of the Internet." A federal judge [ruled](#) this week that the allegation that votes were changed for Biden relied on an "amalgamation of theories, conjecture, and speculation."

A federal judge in Arizona similarly [tossed out a case](#) Wednesday that relied in part on an affidavit from Merritt, writing that allegations "that find favor in the public sphere of gossip and innuendo cannot be a substitute for earnest pleadings and procedure in federal court" and "most certainly cannot be the basis for upending Arizona's 2020 General Election."

Powell is appealing all four of those losses.

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President-elect Joe Biden in Wilmington, Del., on Dec. 9. (Demetrius Freeman/The Washington Post)

Merritt told The Post that, because judges are dismissing the cases without giving the Powell team a chance to fully present evidence, “we’re just going to supply the evidence through other directions,” including to lawmakers and members of the intelligence community. He said Russell Ramsland, a former colleague and fellow witness for Powell, had asked him to brief Rep. Louie Gohmert (R-Tex.), a leading proponent of [fanciful claims](#) about the 2020 election.

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Gohmert did not respond to a request for comment.

The 305th Military Intelligence Battalion at Fort Huachuca



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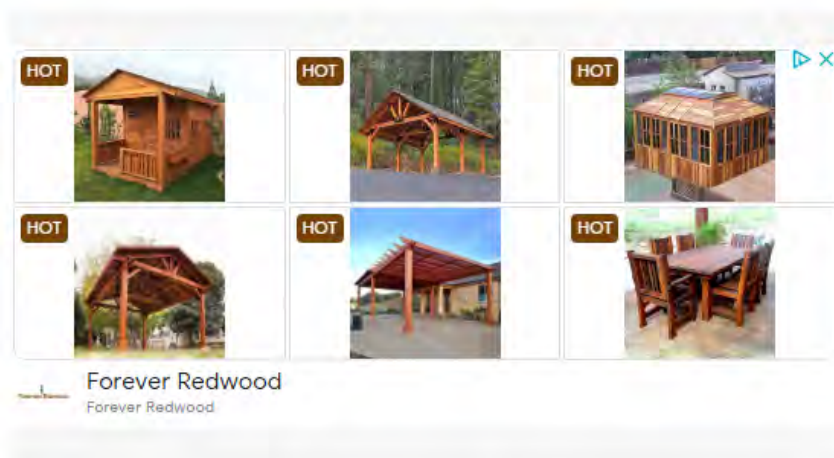


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Gohmert did not respond to a request for comment.

The 305th Military Intelligence Battalion at Fort Huachuca has taken on a special significance among supporters of Powell's lawsuits. Some popular conspiracy theories contend that the unit — rather than Merritt, a former member who was discharged years ago — has determined that China and Iran manipulated the U.S. vote. In late November, Thomas McInerney, a retired lieutenant general in the Air Force and a proponent of election fraud claims, [said](#) that President Trump and Powell have “got the 305th Military Intelligence Battalion working with them” and that “the Kraken is the 305th Military Intelligence Battalion.”

The battalion is an entry-level training unit. It has not had an operational mission since [World War II](#). Mingledorff said soldiers there “do not collect, analyze or provide intelligence in any way.”



Army records provided by Merritt show that he enlisted in 2003. He first aimed to be a medic, but did not graduate from a training program at Fort Sam Houston in Texas, according to records in the Army Training Requirements and Resource System, Mingledorff said. He was “recycled,” or allowed to repeat the training course — but again did not graduate, she



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to records in the Army Training Requirements and Resource System, Mingledorff said. He was “recycled,” or allowed to repeat the training course — but again did not graduate, she said, citing the records.

In 2004, Merritt transferred to the 305th Military Intelligence Battalion, the records show. He had a spot reserved in an electronic intercept analyst course with the 305th, but records show he did not meet the prerequisites and was dropped from the program, Mingledorff said.

Merritt’s military separation papers show that he completed three education courses — two involving work on wheeled vehicles and one on leadership.



Merritt told The Post he completed the medic and intelligence trainings as well. He said that for both programs, the particular career path he was studying for changed by the time his training ended. He maintained that this pattern left him in a sort of military bureaucratic limbo, in the service but without a specific job until he became a wheeled vehicle mechanic in 2005.

He provided a document labeled “unofficial transcript” that he said showed that he completed the intelligence and medic courses. Mingledorff declined to comment on that document



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He provided a document labeled “unofficial transcript” that he said showed that he completed the intelligence and medic courses. Mingledorff declined to comment on that document but said the records she examined were clear.

Army education records also show several distance-learning and in-person trainings over the course of his service, many of which were not completed, Mingledorff said.

He said he was unable to complete some online courses while serving overseas because of the demands of his job.

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Merritt was honorably discharged from the Army in 2013, after a decade of service, including deployments to the wars in Iraq in 2005-2006 and Afghanistan in 2009-2010, according to his separation papers. His commendations included the Combat Action Badge, which is authorized for soldiers who are “present and actively engaging or being engaged by the enemy, and performing satisfactorily in accordance with prescribed rules of engagement.”

Merritt told The Post he left the military because he had reached a “retention control point” and was unlikely to be promoted. Under Army rules, soldiers are only permitted to serve a certain number of years at a particular rank.



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reached a “retention control point” and was unlikely to be promoted. Under Army rules, soldiers are only permitted to serve a certain number of years at a particular rank.

Merritt said cybersecurity was a hobby when he was in the Army, and it became a profession once he was out. He said he is neither a Republican nor a Democrat but a “Constitutionalist” who is just trying to do his part to ensure fair elections in the United States. “Right now you’re looking at two political parties that all they care about is power, they don’t care about people,” he said. “I swore my life to my Constitution and that’s what I keep it at.”



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He used his GI Bill funds to study network security administration at ITT Tech in Arlington, Tex. He said he earned an associate degree from the school, part of a nationwide chain of for-profit colleges that [shut down in 2016](#).

He went on to intern and work in several positions related to cybersecurity, he said. In 2017, he joined a small Dallas-area firm called Allied Special Operations Group, where Ramsland says he is part of the management team.

Merritt said it was there that he began to work on election security and came to believe the system was rife with

says he is part of the management team.



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Merritt said it was there that he began to work on election security and came to believe the system was rife with vulnerabilities. Soon, he said, he was a frequent guest in right-wing videos, appearing under the pseudonym “Jekyll,” in shadow and with his voice disguised as he warned that the U.S. election system was vulnerable to being corrupted on a massive scale.

In 2018, he said, he helped investigate what he described as suspected fraud in races affecting five candidates, including former Kentucky governor Matt Bevin (R) and former Texas congressman Pete Sessions (R). Merritt said he found many elections-related companies plagued by vulnerabilities.

Bevin did not respond to a request for comment.

In a phone interview, Sessions described Merritt as a “top, top computer forensic expert.”

After two decades in Congress, Sessions’s 2018 [loss to Democrat Colin Allred](#), a former professional football player, was viewed by some on election-conspiracy sites as implausible. Merritt said he worked behind the scenes, conducting election-fraud analysis. Sessions would not disclose Merritt’s precise work or whether he was paid, but said of Merritt: “He may have been involved in certain elements of that. It is true there were people who were aware of those things.”





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Rep.-elect Pete Sessions (R-Tex.) speaks on the phone as he arrives to the Hyatt Regency hotel on Capitol Hill in November. Sessions won a different district's election last month and will return to Congress in January. (Sarah Silbiger/Getty Images)

Sessions won a comeback victory in November and will return to Congress next year. He said he was unswayed by the Army's disclosure that Merritt had never completed electronic intelligence training.

"Get the best computer expert you know, have him call and query Josh. Josh will run circles around that person," Sessions said.

No charges were brought in connection with these allegations, Merritt said.

Merritt formed his own firm, Cyberoptyx, in 2019. He said the company — which consists of himself and a handful of contractors — specializes in building "cyberinfrastructure" such as making websites and setting up servers. It also does 3-D printing.

Merritt said he became involved in the Powell litigation through Ramsland. Ramsland has also submitted affidavits as part of Powell's lawsuits, including one that drew attention for [mistakenly using voting data from Minnesota](#) to allege evidence of voter fraud in Michigan.

Merritt said he provides information to Powell's legal team



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for [mistakenly using voting data from Minnesota](#) to allege evidence of voter fraud in Michigan.

Merritt said he provides information to Powell's legal team through intermediaries he knows only by username. He said he is not being paid for his work on the case.

Ramsland did not respond to messages left at his home or on a cellphone registered in his name.

Merritt said he had sought to stay anonymous because he feared for the safety of his family if his name became known. Someone came up with his pseudonym based on the spider-like shape of the diagrams in his declaration, he said.

His name slipped into the court record, though little noticed, on Nov. 25. The Powell team filed a carefully redacted [declaration](#) from its secret witness, but a bookmark in the file uploaded to the court's computer system was visible: "Declaration of JOSHUA MERRITT."

"One jackwagon forgot to clear out the data. I was really pissed," Merritt said. "The guy was like, 'I'm sorry,' and I was like, 'Well, you know, that and a bag of chips will still leave me hungry.'"

On Wednesday night, after a Reuters reporter [tweeted](#) about that flub and drew widespread attention to his name, Merritt was bracing for what might come.

"This is not the 15 minutes I wanted," he said.

Aaron Schaffer, Aaron Blake, Dan Lamothe and Dalton Bennett contributed.



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Aaron Schaffer, Aaron Blake, Dan Lamothe and Dalton Bennett contributed.

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**Emma Brown**

Emma Brown is a reporter on the investigative team who joined The Washington Post in 2009. Previously, she wrote obituaries and covered local and national education. Follow [🐦](#)

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Aaron Davis is an investigative reporter who has covered local, state and federal government, as well as the aviation industry and law enforcement. Davis shared in winning the Pulitzer Prize for Investigative Reporting in 2018. Follow [🐦](#)

**Alice Crites**

Alice Crites is a researcher and librarian who specializes in government and politics and has covered elections since 1994. She was a member of the team that won 2018 Pulitzer Prize for Investigative Reporting for the coverage of Roy Moore and the subsequent sting attempt on the Post. Follow [🐦](#)

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**marvin_gardens** 5 days ago

This is the kind of behavior that *should* get a lawyer disbarred. Misrepresenting the facts about witnesses, in contradiction to what the witness says about himself.

Hello? Why does Sidney Powell still have a license to practice

Exhibit 3



THOMAS A. CLARE, P.C.

CLARE LOCKE
LLP

MEGAN L. MEIER

December 16, 2020

Via Email, Federal Express, & Hand Delivery

Sidney Powell, P.C.
2911 Turtle Creek Blvd, Suite 300
Dallas, Texas 75219
Email: sidneypowell@federalappeals.com

Sidney Powell
Defending the Republic
10130 Northlake Blvd. #214342
West Palm Beach, Florida 34412

Re: *Defamatory Falsehoods About Dominion*

Dear Ms. Powell:

We represent US Dominion Inc. and its wholly owned subsidiaries, Dominion Voting Systems, Inc. and Dominion Voting Systems Corporation (collectively, "Dominion"). We write regarding your wild, knowingly baseless, and false accusations about Dominion, which you made on behalf of the Trump Campaign as part of a coordinated media circus and fundraising scheme featuring your November 19 press conference in Washington, D.C. and including your "Stop the Steal" rally and numerous television and radio appearances on—and statements to—Fox News, Fox Business, Newsmax, and the Rush Limbaugh Radio Show, among others.





I. Your reckless disinformation campaign is predicated on lies that have endangered Dominion's business and the lives of its employees.

Given the sheer volume and ever-expanding set of lies that you have told and are continuing to tell about Dominion as part of your multi-media disinformation "Kraken" fundraising campaign, it would be impractical to address every one of your falsehoods in this letter. Without conceding the truth of any of your claims about Dominion, we write to demand that you retract your most serious false accusations, which have put Dominion's employees' lives at risk and caused enormous harm to the company.

For example, you falsely claimed that Dominion and its software were created in Venezuela for the purpose of rigging elections for the now-deceased Venezuelan dictator Hugo Chavez, that Dominion paid kickbacks to Georgia officials in return for a "no-bid" contract to use Dominion systems in the 2020 election, and that Dominion rigged the 2020 U.S. Presidential Election by manipulating votes, shifting votes, installing and using an algorithm to modify or "weight" votes such that a vote for Biden counted more than a vote for Trump, trashing Trump votes, adding Biden votes, and training election workers to dispose of Trump votes and to add Biden votes.

By way of example only, just last week, you made the following false assertions about Dominion to Jan Jekielek at *The Epoch Times*:¹

Effectively what they did with the machine fraud was to, they did everything from injecting massive quantities of votes into the system that they just made up, to running counterfeit ballots through multiple times in multiple batches to create the appearance of votes that weren't really there. They trashed votes.

These statements are just the tip of the iceberg, which includes similar and other false claims you made at your Washington, D.C. press conference and to other media outlets with global internet audiences.

Your outlandish accusations are demonstrably false. While soliciting people to send you "millions of dollars"² and holding yourself out as a beacon of truth, you have purposefully avoided naming Dominion as a defendant in your sham litigations—effectively denying Dominion the opportunity to disprove your false accusations in court. Dominion values freedom of speech and respects the right of all Americans—of all political persuasions—to exercise their First Amendment rights and to disagree with each other. But while you are entitled to your own opinions, Ms. Powell, you are not entitled to your own facts. Defamatory falsehoods are actionable in court and the U.S.

¹ The Epoch Times, *American Thought Leaders* (Dec. 13, 2020), available at, https://www.theepochtimes.com/exclusive-sidney-powell-on-election-lawsuits-supreme-court-decision-and-the-flynn-case_3617067.html.

² Sidney Powell's Legal Defense Fund, *Defending the Republic*, <https://defendingtherepublic.org/>.



Supreme Court has made clear that “there is no constitutional value in false statements of fact.” *Gertz v. Welch, Inc.*, 418 U.S. 323, 340 (1974). Dominion welcomes transparency and a full investigation of the relevant facts in a court of law, where it is confident the truth will prevail. Here are the facts:

1. Dominion’s vote counts have been repeatedly verified by paper ballot recounts and independent audits.

Dominion is a non-partisan company that has proudly partnered with public officials from both parties in accurately tabulating the votes of the American people in both “red” and “blue” states and counties. Far from being created to rig elections for a now-deceased Venezuelan dictator, Dominion’s voting systems are certified under standards promulgated by the U.S. Election Assistance Commission (“EAC”), reviewed and tested by independent testing laboratories accredited by the EAC, and were designed to be auditable and include a paper ballot backup to verify results. Indeed, paper ballot recounts and independent audits have repeatedly and conclusively debunked your election-rigging claims, and on November 12, 2020, the Elections Infrastructure Government Coordinating Council and the Election Infrastructure Sector Coordinating Executive Committees released a joint statement confirming that there is “*no evidence* that any voting system deleted or lost votes, changed votes, or was in any way compromised” and that the 2020 election was the most secure in American history.³ The Joint Statement was signed and endorsed by, among others, the National Association of State Election Directors, National Association of Secretaries of State, and the U.S. Cybersecurity & Infrastructure Security Agency (“CISA”)—then led by a Trump appointee, Chris Krebs.

In addition, your false accusation that Dominion rigged the 2020 election is based on a demonstrably false premise that wildly overstates Dominion’s very limited role in elections. Dominion provides tools such as voting machines that accurately tabulate votes for the bipartisan poll workers, poll watchers, and local election officials who work tirelessly to run elections and ensure accurate results. Dominion’s machines count votes from county-verified voters using a durable paper ballot. Those paper ballots are the hard evidence proving the accuracy of the vote counts from Dominion’s machines. If Dominion had manipulated the votes, the paper ballots would not match the machine totals. In fact, they do match. Recounts and audits have proven that Dominion did what it was designed and hired to do: accurately tabulate votes.

³ Cybersecurity & Infrastructure Security Agency, *Joint Statement From Elections Infrastructure Government Coordinating Council & The Election Infrastructure Sector Coordinating Executive Committees* (Nov. 12, 2020), available at, <https://www.cisa.gov/news/2020/11/12/joint-statement-elections-infrastructure-government-coordinating-council-election>.



2. Dominion has no connection to Hugo Chavez, Venezuela, or China.

As you are well aware from documents in the public domain and attached to your court filings, *Hugo Chavez's elections were not handled by Dominion*, but by an entirely different company—Smartmatic. This is a critical fact because you have premised your defamatory falsehoods on your intentionally false claim that Dominion and Smartmatic are the same company even though you know that they are entirely separate companies who compete with each other. Dominion was not created in or for Venezuela, has never been located there, and is not owned by Smartmatic or Venezuelan or Chinese investors. Dominion has never provided machines or any of its software or technology to Venezuela, nor has it ever participated in any elections in Venezuela. It did not receive \$400 million from the Chinese in the weeks before the 2020 election or otherwise. It has no ties to the Chinese government, the Venezuelan government, Hugo Chavez, Malloch Brown, George Soros, Bigfoot, or the Loch Ness Monster. Dominion does not use Smartmatic's software or machines, and there was no Smartmatic technology in any of Dominion's voting machines in the 2020 election.

3. You falsely claimed that Dominion's founder admitted he "can change a million votes, no problem at all" and that you would "tweet out the video later"—but you never did so because no such video exists.

During at least one of your many media appearances, you promised to "tweet out [a] video" of Dominion's founder admitting that he "can change a million votes, no problem at all." Your assertion—to a global internet audience—that you had such damning video evidence bolstered your false accusations that Dominion had rigged the election. Yet you have never produced that video because, as you know, it does not exist. Dominion's founder never made such a claim because Dominion cannot change votes. Its machines simply tabulate the paper ballots that remain the custody of the local election officials—nothing more, nothing less.

4. You falsely claimed that you have a Dominion employee "on tape" saying he "rigged the election for Biden"—but you know that no such tape exists.

In peddling your defamatory accusations, you also falsely told a national audience that you had a Dominion employee "on tape" saying that "he rigged the election for Biden." Your own court filings prove that no such tape exists. In them, you cited an interview of Joe Oltmann, a Twitter-banned "political activist" who—far from claiming he had that shocking alleged confession "on tape"—claimed he took "notes" during a conference call he supposedly joined after "infiltrating Antifa." This is a facially ludicrous claim for a number of reasons, including the fact that he lives in Colorado, where it would have been perfectly legal to record such a call if it had actually happened. As a result of your false accusations, that Dominion employee received death threats.



II. Because there is no reliable evidence supporting your defamatory falsehoods, you actively manufactured and misrepresented evidence to support them.

Despite repeatedly routing the overwhelming “evidence” of your assertions during your media campaign, every court to which you submitted that so-called “evidence” has dismissed each of your sham litigations, and even Trump appointees and supporters have acknowledged—including *after* you filed your “evidence” in court, posted it on your fundraising website, and touted it in the media—that there is *no evidence* that actually supports your assertions about Dominion. Indeed:

- One federal judge observed that you submitted “nothing but speculation and conjecture that votes for President Trump were destroyed, discarded or switched to votes for Vice President Biden.” Op. & Order Den. Pl.’s Emer. Motion. for Decl., Emer., and Inj. Relief at 34, *Whitmer v. City of Detroit*, No. 20-cv-12134 (E.D. Mich. Dec. 7, 2020) [Dkt. 62].
- Another federal judge commented that the attachments to your complaint were “only impressive for their volume,” are “largely based on anonymous witnesses, hearsay, and irrelevant analysis of unrelated elections,” and include “expert reports” that “reach implausible conclusions, often because they are derived from wholly unreliable sources.” Order at 24-25, *Bowyer v. Ducey*, No. 2-20-cv-02321 (D. Ariz. Dec. 9, 2020) [Dkt. 84].
- Despite your claim that you have so much “evidence” that it feels as if you are drinking from a “fire hose,” when asked by your interviewers and other media outlets to provide that evidence, you have failed to do so each and every time. Conservative television host Tucker Carlson even called you out for failing to provide any evidence to support your assertions.⁴
- After you put the purported “evidence” in your court filings, Trump loyalist and U.S. Attorney General Bill Barr stated, “There’s been one assertion that would be systemic fraud and that would be the claim that machines were programmed essentially to skew the election results. And the DHS and DOJ have looked into that, and so far, *we haven’t seen anything to substantiate that.*”⁵

⁴ Tucker Carlson SLAMS Sidney Powell for not Providing Evidence Election was Taken from Trump, YouTube (Nov. 19, 2020), available at, <https://www.youtube.com/watch?v=57156147xhk>.

⁵ Michael Malsmo, *Disputing Trump, Barr says no widespread election fraud*, Associated Press (Dec. 1, 2020), available at, <https://apnews.com/article/barr-no-widespread-election-fraud-b1f1488796c9a98c4b1a9061a6c7f49d>.



- Long-time Trump ally Chris Christie said your claims were a “national embarrassment.”⁶
- Trump appointee Chris Krebs, then the director of CISA, determined that the “Hammer and Scorecard” conspiracy theory advanced by your so-called cybersecurity expert, Navid Keshavarz-Nia, was “nonsense.”⁷ And Mr. Keshavarz-Nia’s “expert” declaration alleges a pattern of improbable vote reporting in “Edison County, Michigan,” even though no county by that name exists in Michigan.
- Similarly, another one of your so-called “experts,” Russell Ramsland, in alleging fraud in Michigan, discussed places in Minnesota. He also falsely claimed that voter turnout in Detroit was 139.29% and that turnout in North Muskegon was an eye-popping 781.97%; in reality, the turnout in those places was 50.88% and 78.11%, respectively.⁸ But Mr. Ramsland did not just make sloppy and inexcusable mistakes. He is also a notorious conspiracy theorist, having given a presentation in 2018 in which he claimed that the “Deep State” was formed when the Muslim Brotherhood, President George H.W. Bush’s father, leftists, and George Soros came together in Nazi Germany in the 1930s—notwithstanding the fact that Mr. Soros was born in 1930.⁹
- Another one of your “experts” relied on a list of allegedly ineligible Georgia voters who allegedly voted illegally; but that data included voters who were, in fact, eligible to vote and was rejected by a federal judge for its “sheer unreliability.”¹⁰

⁶ Paul Kane and Felicia Sonmez, *Chris Christie calls the conduct of Trump’s legal team a ‘national embarrassment’*, Washington Post (Nov. 22, 2020), available at, https://www.washingtonpost.com/politics/republicans-christie-trump-concede/2020/11/22/05c280e6-2cda-11eb-bae0-50bb17126614_story.html.

⁷ Zach Montellaro and Kyle Cheney, *Pro-Trump legal crusade peppered with bizarre blunders*, Politico (Dec. 3, 2020), available at <https://www.politico.com/news/2020/12/03/sidney-powell-trump-election-lawsuit-442472>.

⁸ Clara Hendrickson, *Affidavit in Michigan lawsuit seeking to overturn election makes wildly inaccurate claims about vote*, PolitiFact (Dec. 4, 2020), available at, <https://www.politifact.com/factchecks/2020/dec/04/russell-james-ramsland-jr/affidavit-michigan-lawsuit-seeking-overturn-electi/>.

⁹ John Savage, *Texas Tea Partiers Are Freaking Out Over ‘Deep State’ Conspiracy Theories*, Vice (Sept. 30, 2018), available at, <https://www.vice.com/en/article/mbwgxx/texas-tea-partiers-are-freaking-out-over-deep-state-conspiracy-theories>.

¹⁰ Order at 26, *Bowyer v. Ducey*, No. 2-20-cv-02321 (D. Ariz. Dec. 9, 2020) [Dkt. 84]; Michelle Ye Hee Lee, *Here’s what happened when a Georgia lawmaker scrutinized the Trump campaign’s list of allegedly illegal votes*, Washington Post (Dec. 10, 2020), available at, <https://www.washingtonpost.com/politics/heres-what-happened-when-a-georgia-lawmaker->



- Although you cherry-picked statements by Princeton professor Andrew W. Appel in support of your election-rigging claims, he and 58 other specialists in election security have forcefully rebutted your claims, explaining that they “have never claimed that technical vulnerabilities have actually been exploited to alter the outcome of any US election.”¹¹ They further explained that “*no credible evidence* has been put forth that supports a conclusion that the 2020 election outcome in any state has been altered through technical compromise.”¹²

Recognizing the obvious deficiencies and credibility problems of your “evidence,” you actively misrepresented and manufactured evidence to support your defamatory falsehoods. For example:

- You deliberately misrepresented that you had a top secret “military intelligence expert” code-named “Spyder” supporting your defamatory accusations about Dominion. But your purported “military intelligence expert” has now admitted that he never actually worked in military intelligence and that the declaration your team wrote for him to sign is misleading.¹³ This was no good faith mistake. He has confirmed that the original paperwork he sent to you didn’t say that, and that your clerks wrote the misleading statement even though he “was trying to backtrack” on it.¹⁴
- Two of the Venezuelan declarations attached to your court filings contain nearly identical explanations for why the “witnesses” purportedly claim they came forward, proving that those witnesses did not each write their declarations independently and strongly suggesting that the below manifestos and allegations of a decade-old international conspiracy were written or edited by you or your team—not by the witnesses themselves.

[scrutinized-the-trump-campaigns-list-of-allegedly-illegal-votes/2020/12/10/1400d628-3b06-11eb-bc68-96af0daae728_story.html](https://www.mattblaze.org/papers/election2020.pdf).

¹¹ See Scientists say no credible evidence of computer fraud in the 2020 election outcome, but policymakers must work with experts to improve confidence (Nov. 16, 2020), available at, <https://www.mattblaze.org/papers/election2020.pdf>.

¹² *Id.*

¹³ Emma Brown, Aaron C. Davis & Alice Crites, Sidney Powell’s secret ‘military intelligence expert,’ key to fraud claims in election lawsuits, never worked in military intelligence, Washington Post (Dec. 11, 2020), available at, https://www.washingtonpost.com/investigations/sidney-powell-spider-spyder-witness/2020/12/11/0cd567e6-3b2a-11eb-98c4-25dc9f4987e8_story.html.

¹⁴ *Id.*



Declaration of an anonymous source claiming to have been selected for the “national security guard detail of the President of Venezuela.” <i>Pearson v. Kemp</i> , No. 1:20-cv-04809 (N.D. Ga. Nov. 25, 2020) [Dkt. 1-2 at ¶ 4].	Statement by Ana Mercedes Diaz Cardozo, <i>Pearson v. Kemp</i> , No. 1:20-cv-04809 (N.D. Ga. Nov. 25, 2020) [Dkt. 1-3 at ¶ 3].
“I want to alert the public and let the world know the truth about the corruption, manipulation, and lies being committed by a conspiracy of people and companies intent upon betraying the honest people of the United States and their legally constituted institutions and fundamental rights as citizens. This conspiracy began more than a decade ago in Venezuela and has spread to countries all over the world. It is a conspiracy to wrongfully gain and keep power and wealth. It involves political leaders, powerful companies, and other persons whose purpose is to gain and keep power by changing the free will of the people and subverting the proper course of governing.”	“I want to alert the public and let the world know the truth about corruption, manipulation, and lies being committed through a conspiracy of individuals and businesses with the intention of betraying the honest people of the United States and its legally constituted institutions and fundamental rights as citizens. This conspiracy began more than a decade ago in Venezuela and has spread to countries all over the world. It is a conspiracy to unjustly gain and maintain power and wealth. It involves political leaders, powerful companies, and other persons whose purpose is to gain and maintain power by changing people’s free will and subverting the proper course of governing.”

- It also appears that you or your team doctored and misrepresented at least one government document in support of your defamatory accusations about Dominion, attaching and citing an “undated” copy of a certificate from Georgia’s Secretary of State and insinuating that the fact that it was undated supported your defamatory falsehoods. That too was false. In reality, the authentic certificate is both dated and publicly available online.¹⁵

In sum, knowing that you had no reliable evidence, you were actively involved in creating and misrepresenting the so-called “evidence” that you touted during your defamatory media campaign.

¹⁵ Georgia Secretary of State, *Dominion Certification* (Aug. 9, 2019), available at, https://sos.ga.gov/admin/uploads/Dominion_Certification.pdf.



III. You have intentionally disregarded the reliable evidence conclusively debunking your claims and have manufactured defamatory accusations in an effort to discredit the Republican state officials who confirmed the validity of Georgia's election results.

Your falsehoods have been repeatedly and conclusively debunked by the real evidence—i.e., the independent audits and hand recounts of paper ballots that have verified the election results, as confirmed by both Democratic and Republican state officials. For example:

- A spokesperson for the Michigan Secretary of State confirmed, “We have not seen any evidence of fraud or foul play in the actual administration of the election. What we have seen is that it was smooth, transparent, secure and accurate.”¹⁶
- In Arizona, the Chairman of the Maricopa County Board of Supervisors released a statement explaining, “The evidence overwhelmingly shows the system used in Maricopa County is accurate and provided voters with a reliable election ... The Dominion tabulation equipment met mandatory requirements during logic and accuracy testing before the Presidential Preference Election, the Primary Election and the General Election. And after each of these 2020 elections, the hand count audit showed the machines generated an accurate count.”¹⁷
- And in Georgia, the Trump-supporting Republican Secretary of State Brad Raffensperger explained that “Georgia’s historic first statewide audit reaffirmed that the state’s new secure paper ballot voting system accurately counted and reported results.”¹⁸ And, Georgia’s Trump-supporting Republican Governor Brian Kemp likewise refused to overturn the state’s election results.

¹⁶ Nick Corasaniti, Reid J. Epstein & Jim Rutenberg, *The Times Called Officials in Every State: No Evidence of Voter Fraud*, *The N. Y. Times* (Nov. 10, 2020), available at, <https://www.nytimes.com/2020/11/10/us/politics/voting-fraud.html>.

¹⁷ Letter from Clint Hickman to Maricopa Cty. Voters (Nov. 17, 2020), available at, [https://www.maricopa.gov/DocumentCenter/View/64676/PR69-11-17-20-Letter-to-Voters#:~:text=Here%20are%20the%20facts%3A&text=The%20evidence%20overwhelmingly%20shows%20the,voters%20with%20a%20reliable%20election.&text=As%20required%20by%20la w%20\(A.R.S.used%20in%20any%20Arizona%20elections](https://www.maricopa.gov/DocumentCenter/View/64676/PR69-11-17-20-Letter-to-Voters#:~:text=Here%20are%20the%20facts%3A&text=The%20evidence%20overwhelmingly%20shows%20the,voters%20with%20a%20reliable%20election.&text=As%20required%20by%20la w%20(A.R.S.used%20in%20any%20Arizona%20elections).

¹⁸ Georgia Secretary of State, *Historic First Statewide Audit of Paper Ballots Upholds Result of Presidential Race*, available at, <https://sos.ga.gov/index.php/elections/historic-first-statewide-audit-of-paper-ballots-upholds-result-of-presidential-race#:~:text=2020%20Qualifying%20Packer,Historic%20First%20Statewide%20Audit%20of%20Paper%20Ballots%20Upholds%20Result%20of,machine%20tally%20of%20votes%20cast>.



In order to punish and discredit these “disloyal” Republicans for daring to debunk your false accusations, you falsely accused Dominion of paying them kickbacks to get a “no-bid” contract for the use of its systems in the 2020 election. You have never put forward even a shred of evidence—except perhaps for the doctored Secretary of State certificate—in support of these false bribery accusations. No such evidence exists because your accusations are categorically false. Indeed, public records show that, contrary to your false accusations, there was a bid process for the contract in Georgia and that Dominion offered Georgia the lowest-cost system among three companies that submitted bids.¹⁹ Notably, publicly-available records on the Georgia Secretary of State’s website also reflect that *Smartmatic* was one of the other companies that competed with Dominion for that contract, further debunking your false assertions that Dominion and Smartmatic are the same company. *Id.*

IV. There is clear and convincing evidence that you acted with actual malice in making your false and defamatory accusations about Dominion.

While there is no reliable evidence supporting your wild accusations—and compelling reliable evidence debunking them—there is clear and convincing evidence that you knowingly or recklessly disregarded that your claims about Dominion were false and made them anyway, and therefore acted with actual malice. In addition to the direct evidence that you deliberately misrepresented and manufactured purported “evidence” to support your claims, there is also a wealth of circumstantial evidence that you acted with actual malice.

First, your accusations—essentially that Dominion conspired with Republican state officials and thousands of local election workers across the country to perpetrate the greatest fraud in human history—are inherently improbable. You need look no further than the incontrovertible facts that numerous counties in Wisconsin and Pennsylvania that used Dominion systems went for Trump²⁰ and that some states that used Dominion systems were projected to go for Biden, but actually ended up going for Trump. For example, in the final polls, Florida, which uses Dominion systems,²¹ was

¹⁹ Georgia Secretary of State, *Elections Security Is Our Top Priority: Security-Focused Tech Company, Dominion Voting to Implement New Verified Paper Ballot System*, available at, <https://sos.ga.gov/securevoting/>.

²⁰ See Wisconsin presidential results, Politico, available at, <https://www.politico.com/2020-election/results/wisconsin/>; Pennsylvania presidential results, Politico, available at, <https://www.politico.com/2020-election/results/pennsylvania/>; Verified Voting, available at <https://verifiedvoting.org/verifier/#mode/search/year/2020/state/55/make/Dominion%20Voting%20Systems>; Verified Voting, available at <https://verifiedvoting.org/verifier/#mode/search/year/2020/state/42/make/Dominion%20Voting%20Systems>.

²¹ See Verified Voting, available at <https://verifiedvoting.org/election-system/dominion-imagecast-evolution/>; Verified Voting, available at <https://verifiedvoting.org/election-system/dominion-imagecast-central/>.



projected to be a Biden win. Instead, Trump won the state by over 3%.²² Similarly, Ohio was projected to be extremely close, with some polls even showing Biden in the lead. Yet, on election day, Ohio, which also used Dominion systems,²³ went for Trump by over 8%.²⁴ Indeed, across the board in all of the swing states, Trump greatly outperformed the polling averages and final polls.²⁵

Even if we entertain your fantasy for just a moment, why would Dominion have rigged the election for the Democratic nominee for President, but let Democrats lose ground in the House and let the Georgia Senate races proceed to a run-off, rather than handing the Senate majority to the Democrats on November 3?²⁶ Indeed, Dominion systems were used in Iowa,²⁷ Alaska,²⁸ and Georgia²⁹—and yet, none of the four Democratic candidates in those races won the election even though just two wins would have secured the Senate for the Democrats.

²² See RealClear Politics, *Florida: Trump vs. Biden*, available at, https://www.realclearpolitics.com/epolls/2020/president/fl/florida_trump_vs_biden-6841.html (final RCP polling average in Florida was Biden +0.9 and the final result was Trump +3.3).

²³ See Verified Voting, *ImageCast X*, available at, <https://verifiedvoting.org/election-system/dominion-imagecast-x/>; Verified Voting, *ImageCast Evolution*, available at, <https://verifiedvoting.org/election-system/dominion-imagecast-evolution/>; Verified Voting, *ImageCast Central*, available at <https://verifiedvoting.org/election-system/dominion-imagecast-central/>.

²⁴ See RealClear Politics, *Ohio: Trump vs. Biden*, available at, https://www.realclearpolitics.com/epolls/2020/president/oh/ohio_trump_vs_biden-6765.html (final RCP polling average for Ohio was Trump +1.0 and final result was Trump +8.2).

²⁵ See RealClear Politics, *Top Battlegrounds: Wisconsin, Michigan, Pennsylvania, North Carolina Florida, Arizona*, available at, <https://www.realclearpolitics.com/elections/trump-vs-biden-top-battleground-states/>. Trump beat the polling average in Michigan by 1.5%, Wisconsin by 6%, and Arizona by 0.6%.

²⁶ See Fox News, *Presidential Election Results*, available at, <https://www.foxnews.com/elections/2020/general-results>. At present, Republicans have gained at least 8 House seats with 2 races still too close to call.

²⁷ See Verified Voting, *ImageCast X*, available at, <https://verifiedvoting.org/election-system/dominion-imagecast-x/>; Verified Voting, *ImageCast Precinct*, available at, <https://verifiedvoting.org/election-system/dominion-imagecast-precinct/>.

²⁸ See Verified Voting, *ImageCast X*, available at, <https://verifiedvoting.org/election-system/dominion-imagecast-x/>; Verified Voting, *ImageCast Remote*, available at, <https://verifiedvoting.org/election-system/dominion-imagecast-remote/>; Verified Voting, *ImageCast Precinct*, available at, <https://verifiedvoting.org/election-system/dominion-imagecast-precinct/>.

²⁹ See Verified Voting, *ImageCast X*, available at, <https://verifiedvoting.org/election-system/dominion-imagecast-x/>; Verified Voting, *ImageCast Precinct*, available at, <https://verifiedvoting.org/election-system/dominion-imagecast-precinct/>.



Although the indisputable facts all point to the conclusion that this was a free and fair election, you launched a media circus and fundraising campaign that undermined confidence in American democracy and peddled false, inherently improbable, and defamatory claims about Dominion participating in an international conspiracy to rig the election, deeply damaging Dominion's hard-earned reputation and business in the process. Your conduct is evidence of actual malice. See *St. Amant v. Thompson*, 390 U.S. 727, 732 (1968) (the publication of allegations that are "inherently improbable" is strong evidence of actual malice); *Lohrenz v. Donnelly*, 223 F. Supp. 2d 25, 46 (D.D.C. 2002), *aff'd*, 350 F.3d 1272 (D.C. Cir. 2003) ("evidence that the story was so inherently improbable that only a reckless person would have put it in circulation" is "likely [to] support a finding of actual malice").

Second, as set forth above, you had multiple reasons to know that your sources were not reliable, including their lack of relevant credentials, sloppy work product (e.g., confusing Michigan and Minnesota and relying on unreliable data claiming that eligible Georgia voters were not eligible), and unwillingness to be identified publicly. In addition, you had Joe Oltmann's interview making it clear that he does *not* have any recording to substantiate his ludicrous claim that he infiltrated Antifa and heard a Dominion employee saying he rigged the election. Your reliance on these facially unreliable sources—and your *knowing* lie that there was a recording substantiating Mr. Oltmann's claim—is evidence that you acted with actual malice. See *St. Amant*, 390 U.S. at 732 ("[R]ecklessness may be found where there are obvious reasons to doubt the veracity of the informant."); *Wells v. Liddy*, 186 F.3d 505, 542-43 (4th Cir. 1999) (actual malice may be shown where publisher had reason to believe a source might not be credible); *Jankovic v. Int'l Crisis Grp.*, 822 F.3d 576, 590 (D.C. Cir. 2016) (relying on a facially unreliable source is evidence of actual malice); *Celle v. Filipino Rep. Enters., Inc.*, 209 F.3d 163, 190 (2d Cir. 2000) (same).

Third, you intentionally disregarded the key sources who have forcefully, publicly, and repeatedly debunked your dubious claims—namely, the state officials, including respected Republicans like Secretary of State Brad Raffensperger and Governor Brian Kemp, who have confirmed the validity of the election results after hand recounts of paper ballots. Your intentional disregard of these sources is evidence of actual malice. See e.g., *Dongguk Univ. v. Yale Univ.*, 734 F.3d 113, 124 (2d Cir. 2013) ("evidence of an intent to avoid the truth ... [can be] sufficient to satisfy the [actual malice standard]") (quoting *Harte-Hanks Commc'ns, Inc. v. Connaughton*, 491 U.S. 657, 693 (1989)); *Parsi v. Daiouleslam*, 595 F. Supp. 2d 99, 106 (D.D.C. 2009) ("Purposeful avoidance of truth can constitute actual malice").

Fourth, you made these false accusations because they conformed to your preconceived storyline—despite the inherent improbability of your accusations, the unreliability of your sources, and the credibility of the sources debunking your assertions. This too is evidence of actual malice. *Harris v. City of Seattle*, 152 F. App'x 565, 568 (9th Cir. 2005) (quoting 1 Rodney Smolla, *Law of Defamation* § 3:71 (2d ed.)); *Gertz v. Robert Welch, Inc.*, 680 F.2d 527, 539 (7th Cir. 1982) ("[E]vidence that a defendant conceived a story line in advance of an investigation and then consciously set out to make the evidence conform to the preconceived story is evidence of actual



malice, and may often prove to be quite powerful evidence.'"). Indeed, you were peddling your false and preconceived storyline before the polls closed on election day.³⁰

Fifth, you had a financial incentive in making the defamatory accusations. Your own conduct and statements at the press conference, media tour, and on your websites make it clear that you were publicizing your wild accusations as part of a fundraising scheme and in order to drum up additional business and notoriety for yourself. Your financial incentive and motive to make the defamatory accusations is further evidence of actual malice. See *Brown v. Petrolite Corp.*, 965 F.2d 38, 47 (5th Cir. 1992); *Enigma Software Grp. USA, LLC v. Bleeping Computer LLC*, 194 F. Supp. 3d 263, 288 (S.D.N.Y. 2016).

Sixth, you cannot simply claim ignorance of the facts. As a licensed attorney, you were obligated to investigate the factual basis for your claims before making them in court.³¹ There is no factual basis for your defamatory accusations against Dominion and numerous reliable sources and documents in the public domain have repeatedly debunked your accusations. As such, you either conducted the inquiry required of you as a licensed attorney and violated your ethical obligations by knowingly making false assertions rebutted by the information you found, or you violated your ethical obligations by purposefully avoiding undertaking the reasonable inquiry required of you as a member of the bar. Either is additional evidence of actual malice.

Taken together, your deliberate misrepresentation and manufacturing of evidence, the inherent improbability of your accusations, your reliance on facially unreliable sources, your intentional disregard of reliable sources, your preconceived storyline, your financial incentive, and your ethical violations are clear and convincing evidence of actual malice. See *Eramo v. Rolling Stone*, 209 F. Supp. 3d 862, 872 (W.D. Va. 2016) (denying defendant's motion for summary judgment and finding "[a]lthough failure to adequately investigate, a departure from journalistic standards, or ill

³⁰ See OAN, *Sidney Powell: Dems will use 'lawfare' to alter election*, YouTube (Nov. 3, 2020), available at, https://www.youtube.com/watch?v=Vh5U_6apzyl&feature=emb_logo.

³¹ See, e.g., Fed. R. Civ. P. 11(b) ("By presenting to the court a pleading, written motion, or other paper ... an attorney ... certifies that to the best of that person's knowledge, information, and belief, formed after an inquiry reasonable under the circumstances ... the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery"); Texas Disciplinary Rules of Professional Conduct 3.01 ("A lawyer shall not bring or defend a proceeding, or assert or controvert an issue therein, unless the lawyer reasonably believes that there is a basis for doing so that is not frivolous."); *id.*, Comment 2 ("All judicial systems prohibit, at a minimum, the filing of frivolous or knowingly false pleadings, motions or other papers with the court or the assertion in an adjudicatory proceeding of a knowingly false claim or defense."); *id.*, Comment 3 (prohibiting a filing "if it contains knowingly false statements of fact.").



will or intent to injure will not singularly provide evidence of actual malice, the court believes that proof of all three is sufficient to create a genuine issue of material fact").

V. Your false and defamatory accusations must be retracted.

Your false accusations about Dominion are defamatory *per se* and have exposed you, the entities you control, and the Trump Campaign to substantial legal risk for defamation. As a result of your false accusations, Dominion has suffered enormous harm, and its employees have been stalked, have been harassed, and have received death threats. For the safety of Dominion's employees and for the sake of the truth and confidence in American democracy, we demand that you immediately and publicly retract your false accusations and set the record straight. If you refuse to do so and instead choose to stand by your defamatory falsehoods, that will be viewed as additional evidence of actual malice. See *Zerangue v. TSP Newspapers, Inc.*, 814 F.2d 1066, 1071 (5th Cir. 1987) ("[r]efusal to retract an exposed error tends to support a finding of actual malice.").

Until these claims are resolved, please ensure that you, your principals, and all your sources are preserving and retaining all emails, text messages, audiovisual recordings, voice mails, drafts, notes, communications, documents, data, and electronically stored information of any kind that relates in any way to these matters. Without limitation, this requires you to preserve all financial and corporate records of your "legal defense fund" Defending the Republic, all versions of all documents attached to any of your lawsuits relating to the election, including the undoctored and doctored version of the Secretary of State certificate referenced above, all drafts of and comments to all declarations attached to your complaints, and all communications with:

- Any member, volunteer, staff, or employee of the Trump Campaign;
- Your associates, clerks, and paralegals; and Rudy Giuliani, Jenna Ellis, Lin Wood, and each of their associates and paralegals;
- Every individual who submitted a declaration attached to any of your complaints relating to the election;
- Every reporter, editor, blogger, host, or other member of the media with whom you communicated about Dominion or the 2020 election, regardless of whether they published any of your claims; and
- Donors to your "legal defense fund," Defending the Republic.



Your document preservation obligations apply both to you individually, as well as to any entities you control, including but not limited to your law firm and your “legal defense fund,” Defending the Republic. Please confirm receipt of this letter and that you intend to adhere to our request to retain documents as set forth above. This is not a complete recitation of our client’s rights and remedies, all of which are expressly reserved.

We look forward to your prompt response.

Regards,

Thomas. A. Clare, P.C.

Megan L. Meier

Exhibit 4

← Tweet



Sidney Powell 🇺🇸 ⭐⭐⭐ #Kraken
@SidneyPowell1

Same is true for #Dominion
Heard they wrote me too!
Haven't seen it but retracting nothing
We have #evidence
They are #fraud masters!
[@tracybeanz](#)
[@GenFlynn](#)
[@realDonaldTrump](#)
[@LLinWood](#)
[@MajorPatriot](#)
[@MajorKillSwitch](#)
[@Scavino45](#)
[@marklevinshow](#)
[@BillWhiteNY](#)
[@BarbaraRedgate](#)



Lin Wood @LLinWood · Dec 20, 2020

Knowing my background & experience in defamation law, Sidney @SidneyPowell1 asked me to represent her & respond to SmartMatic litigation threat.

Since everything Sidney is saying about election fraud is documented TRUTH, my response to SmartMatic was simple & to the point.

lwood@linwoodlaw.com

December 20, 2020

VIA ELECTRONIC MAIL ONLY

J. Erik Connolly
Benesch, Friedlander, Caplan & Aronoff LLP
71 South Wacker Drive, Suite 1600
Chicago, IL 60606-4637
connolly@beneschlaw.com

RE: Legal Notice and Retraction Demand from Smartmatic USA Corp.

Dear Erik:

I represent Sidney Powell. I have carefully reviewed your letter of December 15, 2020. I am not impressed. Ms. Powell retracts nothing.

3:47 PM · Dec 20, 2020 · Twitter for iPhone

11.8K Retweets 525 Quote Tweets 34.1K Likes



Exhibit 5

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FILE NAME:
EXCLUSIVE_Sidney Powell
(22:12 min)

TRANSCRIPT OF VIDEO-RECORDED INTERVIEW
SIDNEY POWELL
LARRY O'CONNOR

Transcribed By:
TERRI NESTORE
CSR No. 5614, RPR, CRR

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1 LARRY O'CONNOR: Joining us right now is one of
2 the very courageous women trying to fight that fight to
3 ensure that we do have a solid electoral system. She is
4 Sidney Powell, the lead attorney for the Trump campaign
5 legal team.

6 And Counselor, thank you for joining us today.

7 SIDNEY POWELL: Oh, thank you, Larry.

8 LARRY O'CONNOR: There's a couple of things that
9 you all presented yesterday at this extraordinary press
10 conference that really it bears repeating and it bears a
11 little bit of fleshing out, and I want to get to as much
12 of it as I can.

13 First of all, the question of overvotes and
14 overballots, this has something that's been so maddening
15 for so many people when they see precincts, mostly in
16 cities like Milwaukee and Detroit, Philadelphia,
17 Pittsburgh, and they see precincts where they had 200 to
18 300 percent turnout.

19 Has your investigations at this point been able
20 to come up with a clear answer as to what exactly happened
21 there?

22 SIDNEY POWELL: Well, it's probably attributable
23 to fraudulent mail-in ballots or computer alterations of
24 the vote. Either one is distinctly possible. And of
25 course, you know, we have a lot of dead people voting but

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1 that's not what my case is really based on. That's
2 certainly one of the issues that indicates a scheme to
3 defraud the people of their legal votes.

4 LARRY O'CONNOR: Yeah.

5 SIDNEY POWELL: Because people had to go out and
6 affirmatively fill in ballots for people that they knew
7 were dead and then file them, and each of those is a
8 federal crime, punishable by five years in prison, if I
9 recall correctly.

10 LARRY O'CONNOR: And that actually raises another
11 question -- there's so many questions that I have.

12 Your effort right now is a civil effort on behalf
13 of the presidential campaign of Donald Trump.

14 What you are alleging, what your co-counsellors
15 are alleging and have presented, they're criminal actions.

16 Is there any cooperation or do you know are there
17 independent investigations going on with the FBI and the
18 Justice Department?

19 SIDNEY POWELL: I have no knowledge of
20 independent investigations by the FBI and Justice
21 Department. I can't imagine that people haven't been
22 apprehended and arrested and indicted already for some of
23 these clearly, easily provable, outrageous crimes that
24 would set an example for others to know that they can't go
25 around doing this. We've got evidence of paying for

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1 ballots to be harvested in at least one major city that is
2 corrupted.

3 Larry, the information is coming in at a faster
4 rate than our little team of lawyers can even process it.

5 Americans are fed up with the corruption, they
6 are starting to report it and come forward and give
7 evidence and we've got videos now. All kinds of different
8 things are falling into our hands and being given to us
9 because people trust us to do something about it, while
10 our government has done nothing but either turn a blind
11 eye or deliberately use it to mislead the American people.

12 LARRY O'CONNOR: I think that much of the
13 discussion of your appearance yesterday, Sidney Powell,
14 centered around the charges that you made with regard to
15 the computerized ballot system and the software, and I
16 know -- and I'm not going to insult your intelligence to
17 suggest that here on the radio you're going to present
18 some sort of evidence that you're going -- that you would
19 normally present in open court.

20 My interest is actually more in terms of what
21 type of evidence you could produce. Is the allegation
22 here that there is a backdoor in the software system and
23 people accessed that and just created vote tallies that
24 did not exist? And if that's the case --

25 SIDNEY POWELL: That's part of it, yes.

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1 LARRY O'CONNOR: Okay, so how do you prove that?

2 SIDNEY POWELL: Their system even admits -- their
3 own training manual admits that they -- that people can go
4 in and do that; that people can go in and put all kinds of
5 votes in a trash folder, essentially, and then trash 'em.

6 LARRY O'CONNOR: Oh, yes, I've read the
7 articles -- remarkably in the New York Times and the
8 Huffington Post, ironically, from several years before
9 this election. Now they're silent on the issue.

10 SIDNEY POWELL: Right.

11 LARRY O'CONNOR: I recognize that the software is
12 capable of being accessed that way. Again, my question is
13 how does one prove that that's what happened in this case?

14 SIDNEY POWELL: Well, there are devices on the
15 internet that can be used to see it and we have multiple
16 people who actually saw it as it was happening, and so we
17 essentially have some pictures of it.

18 LARRY O'CONNOR: Ah, okay.

19 SIDNEY POWELL: And it is terrifying and it is a
20 huge national security issue.

21 Why the Department of Justice and the FBI have
22 not done something on this immediately is beyond my
23 comprehension. Dominion is closing its offices and
24 moving. No doubt they're shredding documents, and god
25 only knows what else.

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1 More than a hundred Dominion people have wiped
2 any connection with Dominion off the internet. They're
3 taking down prior articles about them.

4 Carolyn Maloney, I think it was, wrote a letter
5 to the Secretary of the Treasury or some government
6 official back in 2013, I think it was, complaining about
7 this and raising questions about it and suggesting and
8 saying it was foreign owned and shouldn't be approved.

9 Well, you know, all they did was create a shell
10 company in the United States, but they're completely
11 intertwined, they share office space with one of George
12 Soros' groups. His number two man heads up the operation
13 out of England.

14 But the money for it was all funded from
15 Venezuela and Cuba and communists, and they did it --
16 we've got an eyewitness to all of it who's given a sworn
17 affidavit that he saw it all done, and the purpose it was
18 done for was to rig elections.

19 LARRY O'CONNOR: Now -- and we're speaking with
20 Sidney Powell. She is the lead attorney on the Trump
21 campaign legal team and you saw her at the press
22 conference yesterday. We've been talking quite a bit.

23 And by the way, Sidney Powell, you've been -- I'd
24 consider you a friend, first of all.

25 SIDNEY POWELL: Yes.

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1 LARRY O'CONNOR: And as well as a fantastic guest
2 on my programs for many years now leading up to this. I
3 have the utmost respect for you and I know how
4 passionately you feel about these things and because of
5 that, you have incredible credibility with me and
6 therefore, with our audience as well.

7 We do have questions with regard to the computer
8 system and whether there is a paper backup.

9 So in other words, if there is an access via the
10 software, where they can just manipulate and make votes
11 appear, at some point there needs to be a ballot to back
12 that up, just in case there is an audit process, right?

13 Is that part of your argument as well?

14 SIDNEY POWELL: That is. We have pictures of
15 bags of paper ballots being trashed, we have evidence of
16 shredders running to cover paper ballots, we have
17 testimony of a witness who saw ballots from military
18 people opened and if they were for Trump, they were thrown
19 out and a substitute ballot was put in for Biden.

20 LARRY O'CONNOR: And these are all people who are
21 swearing under oath, with their names -- I mean because
22 God knows, they are going to be attacked mercilessly.

23 SIDNEY POWELL: Exactly. And that's one reason
24 why we haven't made these specific affidavits public
25 because some of them, just by what they say, you can

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1 identify who the person was but, you know, I'm essentially
2 staking my personal and professional reputation on these
3 allegations, and I have no hesitation, from what I've
4 seen, in doing so. In fact, I think it would be
5 irresponsible, if not criminal of me, not to come forward
6 with it.

7 LARRY O'CONNOR: One part of yesterday's
8 statement, Sidney Powell, really caught my eye, when you
9 -- and I'm paraphrasing -- but you basically said this
10 system was set up in a way where whoever was willing to
11 pay the right amount, they'd get the election results that
12 they're looking for, and that was a nonpartisan statement.

13 SIDNEY POWELL: Exactly. The republicans are as
14 much at fault with this as the democrats. There's no
15 telling who we have elected, we thought we elected, that
16 we didn't elect at all, that bought the machinations in
17 more ways than one to put themselves in office and I
18 guarandamntee you it crosses party lines because for some
19 reason, the republicans have opposed any sort of
20 investigation of these systems for the last several years.

21 You know, previously it was the democrats
22 complaining about it.

23 LARRY O'CONNOR: I'm hearing --

24 SIDNEY POWELL: Carolyn Maloney, Amy Klobuchar,
25 Senator Warren were all over it, but now is the first time

1 -- well, no, it's not the first time. Actually, I've got
2 statistical maps of data from the 2016 election in
3 California that we haven't even had the resources to get
4 crunched yet, but the person who did it told me that that
5 was used, the machine was used then to deprive Bernie
6 Sanders of the election in California that he would have
7 won or might have won the California primary, and Hillary
8 Clinton used it to screw him out of that, and these people
9 even told Bernie about it and instead of doing anything
10 about it, he sold out.

11 LARRY O'CONNOR: Wow. I don't know -- by the
12 way, I don't know if you've seen this news but there was
13 supposed to be a hearing in the state of Pennsylvania
14 today with a representative from Dominion. They had
15 volunteered to come in and answer questions from the State
16 government committee overlooking these things, and at the
17 last minute this morning they backed out and decided that
18 they didn't want to face the lawmakers in Pennsylvania.

19 Have you heard about this?

20 SIDNEY POWELL: Yes, I did hear about that and I
21 am sure they are now all hiring lawyers and everything
22 else because they knew exactly what they were doing. They
23 advertised these features of their machines. They briefed
24 people on the features of their machines. They paid
25 kickbacks and benefits to the families of public officials

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1 who bought -- or got them their government contracts.

2 I mean, this is a national and international
3 cesspool of corruption.

4 LARRY O'CONNOR: There's been some suggestion in
5 the media -- I don't blame you if you ignore the media, so
6 I'll pass on some of the things that are being said.

7 SIDNEY POWELL: Right.

8 LARRY O'CONNOR: But there's some suggestion --

9 SIDNEY POWELL: I pay no attention to anything
10 anybody's saying about me.

11 LARRY O'CONNOR: There's some suggestion that
12 Dominion and the software company, it's not Selecta -- I'm
13 sorry, help me out.

14 SIDNEY POWELL: Smartmatic.

15 LARRY O'CONNOR: Thank you. That they might sue
16 you for the allegations you made yesterday, and I'm
17 wondering what your response about -- I'm guessing you'd
18 welcome that because that would bring on discovery of
19 these things.

20 SIDNEY POWELL: Oh, yeah, I'd love to have full
21 discovery, because right now we're limited to what we can
22 do in the election contest, and that doesn't include
23 discovery. But yeah, I'd love to have civil discovery of
24 everything about Dominion and Smartmatic and Lord
25 Malloch-Brown, the Soros guy, and the Venezuelan people

1 that put this together and sold it all over the world and
2 Mr. Eric Coomer, who's on video saying he had the election
3 rigged with a Black Lives Matter or Antifa group, bragging
4 about how he'd had it fixed for Biden, nobody had to worry
5 about it.

6 Yeah, give me civil discovery.

7 I'll take that any day.

8 LARRY O'CONNOR: I know you mentioned how hard
9 your team is working -- and people should know, the vast
10 majority of the lawyers that are working on this in the
11 various states -- and these are multiple efforts in
12 multiple states -- are volunteering their time. I know a
13 couple of lawyers who have volunteered and they went to
14 the sound of the drums and they've been up there with
15 their pitches and -- their pitchforks and their torches.

16 There is a timeline here and there is a real
17 major deadline coming up here constitutionally, with
18 regard to the Electoral College.

19 Can you sort of lay out what you expect to happen
20 over the course of the next two weeks.

21 SIDNEY POWELL: Well, I think over the next two
22 weeks we will get a fraud complaint filed that makes
23 people's jaws hit the floor.

24 I really think we can get at least the initial
25 outline of the whole plan put together and documented by

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1 then. Evidence is going to continue to come in.

2 What I remain just absolutely appalled about is
3 the failure of the government to seize the Dominion
4 machines in every state and in every place.

5 And it's not just the Dominion machines, Larry.

6 The same DNA code of the corrupt system is in
7 other voting machines around the country too, owned by
8 other companies -- whether they know it or not, I don't
9 know, but I can't imagine they don't.

10 LARRY O'CONNOR: There's been some concern here
11 over the idea that this action that you're taking is going
12 to demoralize voters, demoralize republican voters, turn
13 off republican voters. It will affect the turnout for the
14 Georgia runoffs that are coming and that people --

15 SIDNEY POWELL: There shouldn't be a Georgia
16 runoff with these machines. There should be an injunction
17 issued or a court order issued to stop the Georgia runoff.

18 They cannot rely on these machines, in no way,
19 shape or form.

20 LARRY O'CONNOR: The recount was just certified.

21 The people of Georgia, the Secretary of State
22 there claims, listen, we looked at it all, we audited it
23 all and the paper ballots matched what the computer said.

24 How do you respond?

25 SIDNEY POWELL: That's a lie. Well, it might

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1 have. I mean, you can rerun the same corrupted ballots
2 through a machine and come out with the same thing.

3 LARRY O'CONNOR: Yeah.

4 SIDNEY POWELL: That really doesn't prove
5 anything. The machine can override review of signatures,
6 it can override review of the top part of the ballot or
7 one particular candidate. They can program it to do
8 anything you can program a computer to do, and that's what
9 they've done.

10 Not to mention the Secretary of State of Georgia
11 and the governor of Georgia rushed to give a hundred
12 million dollar contract to Dominion, I think in 2019,
13 which is not that long ago before the election started,
14 and that was a hundred million dollar system.

15 We have one lawyer that has told me that they got
16 essentially kickbacks and benefits for their families from
17 doing that, not to mention what I would call election
18 insurance, knowing that they would be elected or reelected
19 in the process.

20 And it's got to be criminally investigated, every
21 bit of it, in every state, and cleaned up. We've got to
22 have a ballot system that the American people can trust.

23 We're supposed to be a republic.

24 LARRY O'CONNOR: I agree. The most terrifying
25 thing about this -- and you mentioned how frightening this

1 was, you used those word yesterday, and it's appropriate
2 because if we don't believe -- if we don't believe our
3 vote counts, if we think that all of our work and all of
4 our action and going to rallies and raising money and
5 getting our neighbors together and going out and vote and
6 then it just doesn't matter anyway, then we are lost.

7 We are lost as a republic, Sidney Powell, and
8 that's why I know you're so passionate, and I'm passionate
9 about this as well.

10 SIDNEY POWELL: Yes.

11 LARRY O'CONNOR: I'm curious about one thing and
12 again, I'm just trying to rationalize all of this in my
13 head.

14 SIDNEY POWELL: Sure. I mean, it's a lot to wrap
15 your head around.

16 LARRY O'CONNOR: Oh, I know.

17 If they're able to access this software from the
18 backdoor and manipulate the numbers, and then they produce
19 the ballots later to sort of back up the software
20 manipulation, if they can produce those ballots, why
21 bother manipulating the software? You know what I mean?
22 If they can just produce a hundred thousand ballots, can't
23 they just do that and then scan them? They don't have to
24 access the software, do you know what I mean?

25 SIDNEY POWELL: Well, yeah, but to keep the

1 voting going in realtime, the way that they've been doing
2 it, they have to do it electronically.

3 And the reason they shut the machines down was --
4 what was it, five states that all of a sudden stopped
5 counting?

6 LARRY O'CONNOR: Right.

7 SIDNEY POWELL: It's never happened in the
8 history of elections.

9 LARRY O'CONNOR: I remember covering it live on
10 the air thinking, why is everything stopped?

11 What's happening here in these states?

12 SIDNEY POWELL: Exactly. Well, what stopped was
13 Trump voters essentially broke the algorithm.

14 They had already figured out the algorithm they
15 thought they needed to make sure Biden won, and so they
16 had ran -- I think they ran that probably across the
17 country. I don't know that for sure. That's an educated
18 supposition at this point because, you know, they wanted
19 to make sure he got the vote.

20 But what happened was there were so many more
21 Trump votes than the algorithm could compensate for, that
22 was already preprogrammed in there, they had to stop the
23 machines to -- for several hours to backfill the
24 additional vote needed to push Biden over in those certain
25 areas in the swing states.

1 LARRY O'CONNOR: I also want to say Sidney Powell
2 was a frequent guest on this program during the beginning
3 parts of the Robert Mueller investigation. She knew most
4 of the people involved in that.

5 Everything she said about that investigation and
6 the people involved was proven correct.

7 When she took on the case of General Michael
8 Flynn, everything she predicted and everything she said in
9 the early stages of that case, eventually came out, once
10 the Justice Department was finally compelled to produce --
11 in fact, they still haven't produced all of the evidence
12 in that case, have they, Sidney Powell?

13 SIDNEY POWELL: No, they haven't.

14 No, they haven't.

15 LARRY O'CONNOR: But you've been proven right
16 that entire time, and I just want to say, you know, I've
17 been in contact with Sidney from this weekend. On Monday,
18 I tried to get Sidney on the show and she said to me, I'm
19 not going to be doing much media at all this week. We'll
20 talk on Friday. On Friday I'll be able to, and here you
21 are on Friday.

22 And I say that because I think it's fair for you
23 to respond to what Tucker Carlson said last night.

24 When I watched his monologue I thought, well,
25 wait a minute. I was texting with Sidney Powell too and

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1 as soon as she said I'm not doing media until Friday, I
2 laid off and I waited until Friday.

3 How do you respond to what you heard last night?

4 Because it carries a lot of weight when Tucker
5 Carlson goes on Fox News and says what he said.

6 SIDNEY POWELL: Well, he was -- he sent me some
7 -- I had been corresponding with him. I sent him one of
8 the affidavits, one of the most important affidavits, in
9 response to his request, and then I got some very nasty,
10 rude, condescending and arrogant and demeaning messages
11 from him that I simply did not appreciate or have time to
12 deal with. So I offered him another witness that I
13 thought would be able to explain and answer his questions
14 and he still continued to insult me, and I just told him
15 not to contact me any further and right now I assure you
16 that when I have something else to say, it will not be on
17 Tucker Carlson's show.

18 LARRY O'CONNOR: Sidney Powell, thank you for
19 joining us today. I know that you've got a lot of work to
20 do -- a mountain of work to do.

21 By the way, I hear this a lot. If there are
22 people who want to help your effort, what can they do?

23 SIDNEY POWELL: Yes. We've started a nonprofit
24 501(c)(4), so it's not tax deductible, but it's
25 essentially a legal defense fund for the republic.

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1 I am not being paid by the campaign, I'm being
2 paid by the people of the United States of America, and I
3 want to make sure we get this right for the future of this
4 country. It's called defendingtherepublic.org.

5 LARRY O'CONNOR: Thank you, Sidney.

6 Get back to work.

7 SIDNEY POWELL: Thank you.

8 LARRY O'CONNOR: I appreciate you joining us.

9 SIDNEY POWELL: Thank you, Larry, I will.

10 Thanks, bye.

11 (End of interview.)

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C E R T I F I C A T E

I, TERRI NESTORE, Certified Shorthand Reporter/
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I further certify that I am not of counsel or
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Dated this 18th day of December, 2020.



TERRI NESTORE, CSR 5614, RPR, CRR

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FILE NAME:

Sidney Powell on Lou Dobbs Tonight on 113020

(8:15 min)

TRANSCRIPT OF VIDEO-RECORDED INTERVIEW

SIDNEY POWELL

LOU DOBBS

Transcribed By:
TERRI NESTORE
CSR No. 5614, RPR, CRR

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1 LOU DOBBS: Joining us now is Sidney Powell.
2 She's a former federal prosecutor, General Michael Flynn's
3 defense attorney, a great American, and I know for a fact
4 is busy as she can possibly be, working all hours of the
5 day.

6 Sidney, thanks for taking the time to be with us.

7 Let me just start by saying this time is yours.

8 Right now, this audience, most of America, wants
9 to know where are we, in this fight for the Whitehouse?

10 SIDNEY POWELL: Well, we are making great
11 progress, Lou. We have one case in the court in Georgia
12 that's getting ready to go to the Eleventh Circuit. We're
13 going to ask for emergency review of that, where we sought
14 to impound all the voting machines in Georgia and we need,
15 frankly, to stop the election that's supposed to happen in
16 January because all the machines are infected with the
17 software code that allows Dominion to shave votes for one
18 candidate and give them to another, and other features
19 that do the same thing, and we've filed suit also in
20 Michigan and we're preparing suits for several other
21 states and as I'm sure your viewers hopefully know and
22 caught part of the hearing in Arizona today that Rudy
23 Giuliani conducted for the legislature to see much of the
24 evidence that has been accumulated by some experts that
25 will be helping our case also.

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1 It's just pouring out more by the day. People
2 are coming forward with different bits and pieces of the
3 puzzle. Different states shaved different amounts of
4 votes or the system was set up to shave and flip different
5 votes in different states. Some people were targeted as
6 individual candidates. It's really the most massive and
7 historical egregious fraud the world has ever seen.

8 LOU DOBBS: The top officials of the Georgia
9 State government, the Secretary of State, the governor,
10 Brian Kemp, was in a very similar situation, as we
11 reported here at the top of the broadcast, three years ago
12 when he was Secretary of State, and he was sued as
13 Secretary of State of the state of Georgia and incredibly,
14 as soon as that lawsuit was filed, that server, under
15 Secretary of State Kemp, was wiped and that has --
16 obviously was at the core of your concerns in seeking an
17 injunction from Judge Batten, the Federal District Court
18 judge who issued the restraining order, correct?

19 SIDNEY POWELL: Correct. And guess what happened
20 yesterday while we were in the process of trying to get
21 the State to respond for our request to the restraining
22 order? Someone went down to the Fulton Center where the
23 votes and Dominion machines were, claimed there was a
24 software glitch and they had to replace the software, and
25 it seems that they removed the server.

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1 LOU DOBBS: Unbelievable. Unbelievable.

2 Do we know where the server is?

3 SIDNEY POWELL: No, we don't, right now.

4 LOU DOBBS: You know, people don't go to jail for
5 their attitude, but in the case of the Secretary of State
6 and the governor of Georgia right now, one would be
7 tempted to prosecute, based on their conduct so far.

8 What is going on with those two individuals?

9 SIDNEY POWELL: I think there's a lot going on,
10 Lou. I think there's a lot of corruption there,
11 underneath the surface. We've gotten tips from different
12 people that we haven't been able to verify completely yet,
13 but it seems that there were significant benefits for both
14 Governor Kemp and perhaps Mr. Raffensperger also, and
15 maybe others on their team, for deciding at the last
16 minute to rush in a contract for Dominion for \$107 million
17 for the State.

18 Ironically, the State lawyers claimed yesterday
19 that the State had no control over the counties' handling
20 of the voting machines, never mind the State itself
21 purchased the machines and forced them to use them, and
22 the Secretary of State is responsible for all fraud
23 investigations of voting and everything else with respect
24 to voting. It was one of the most disingenuous arguments
25 I've heard any government counsel make, but that's what

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1 they all seem to do these days.

2 LOU DOBBS: Initially the judge granted the
3 temporary restraining order, then reversed himself after
4 the State had made that claim, then reversed it -- himself
5 again and ordered the impoundment, effectively the
6 impoundment of those machines, but obviously within that
7 window, apparently, in Fulton County, the State of Georgia
8 took that server.

9 Now, do we know -- you know, I just can't -- I
10 think most Americans right now cannot believe what we are
11 witnessing in this election. We have, across almost every
12 state, whether it's Dominion, whatever the company --
13 voting machine company is, no one knows their ownership,
14 has no idea what's going on in those servers, has no
15 understanding of the software, because it's proprietary.

16 It is the most ludicrous, irresponsible and
17 rancid system imaginable in the world's only superpower.
18 We look like a complete nation of fools, and we're
19 supposed to be meeting constitutional deadlines on
20 December 8th, December 14th. Are you kidding me? This
21 thing should be shut down right now and people understand
22 that this will not be tolerated by the American people.

23 SIDNEY POWELL: You are absolutely right, Lou. I
24 couldn't have put it better myself. I can't even begin to
25 tell you how appalling everything I'm seeing is.

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1 Somebody sent me the tape from a machine in
2 California and it reported 550 votes with 270 voters.
3 That's the kind of thing we're seeing when we can get the
4 actual documents. Meanwhile, Dominion and its minions and
5 other State officials everywhere are apparently out there
6 trying to destroy everything they can get to before we can
7 seize it, and our Department of Justice and FBI are
8 nowhere to be found.

9 I am absolutely, livid and I know the American
10 people are livid too. That's why we started the
11 defendingtherepublic.org to fight this.

12 LOU DOBBS: Let me be straightforward with you.

13 I'd damn sight rather have Sidney Powell and Rudy
14 Giuliani on the case than Christopher Wray and the fools,
15 the corrupt fools that lead the FBI, any day. I wish it
16 were otherwise, but the American people understand what we
17 now are up against in this country.

18 And as I said at the outset of the broadcast,
19 Sidney, this is no longer about just voter fraud or
20 electoral fraud, this is something much bigger and this
21 president has to take, I believe, drastic action, dramatic
22 action, to make certain that the integrity of this
23 election is understood, or lack of it, the crimes that
24 have been committed against him and the American people.

25 And if the Justice Department doesn't want to do

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1 it, if the FBI cannot do it, then we have to find other
2 resources within the federal government.

3 We've got to rise above this because the nation
4 itself -- this is an assault on the core of a democracy --
5 any democracy -- our ability to cast a secret ballot.

6 Your thoughts, Sidney, as we wrap up here.

7 SIDNEY POWELL: That's exactly right, Lou.

8 It affects the bedrock of our democratic
9 republic. It can't be allowed to stand and frankly, I'm
10 about to think the entire FBI and the entire Department of
11 Justice need to be hosed out with Clorox and firehoses.

12 LOU DOBBS: Well, Sidney, I think right now that
13 you would get many seconds for that proposition.

14 Sidney Powell, thanks for being with us.

15 We appreciate it, and thanks for everything
16 you're doing for this country.

17 (End of recording.)
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C E R T I F I C A T E

I, TERRI NESTORE, Certified Shorthand Reporter/
Transcriptionist, do hereby certify that I was authorized
to transcribe the foregoing recorded proceeding, and that
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listening to the provided recording.

I further certify that I am not of counsel or
attorney for either or any of the parties to said
proceedings, nor in any way interested in the events of
this cause, and that I am not related to any of the
parties thereto.

Dated this 18th day of December, 2020.



TERRI NESTORE, CSR 5614, RPR, CRR

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Exhibit 7



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To protect and defend the lawful votes of American citizens, ensure election integrity, educate the world on what it means to be a constitutional Republic, and pursue legal action to preserve the vision of our Founders and to maintain this great Republic.

Sidney Powell

Attorney Sidney Powell needs your immediate support to halt the certification of ballots in Georgia, Michigan, Arizona, Nevada, Pennsylvania, and Wisconsin.

To contact Sidney Powell directly, please visit her website:

<https://www.sidneypowell.com>

Millions of dollars must be raised to defend the Republic as these lawsuits continue to be filed to ensure victory.

In Bush v. Gore the Supreme Court recognized that once vested in the people, the right to vote is fundamental, and one source of its fundamental nature lies in the equal weight of each vote.

This fundamental right to equal weight was not defended or actualized in this election. There is evidence of ballots being discarded, hundreds of thousands of ballots appearing out of thin air, ballot harvesting, and a lower standard of verification for some mail-in ballots. This is voter fraud and has infringed upon Americans' sacred right to vote and for their votes to carry equal weight.

lower standard of verification for some mail-in ballots. This is voter fraud and has infringed upon Americans' sacred right to vote and for their votes to carry equal weight.

The case will seek to block the certification of the election results so that justice can be done. We need to stop the steal in its tracks.

The future of our Republic is at stake. The left, the media, and a complicit Republican Establishment are attempting to steal this election through a staggering voter fraud operation. The time to fight is now!

"A Republic...if you can keep it."

Benjamin Franklin



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Exhibit 8



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- [Revocations of 501\(c\)\(3\) Determinations](#)
- [Suspensions Pursuant to Code Section 501\(p\)](#)
- [Exempt Organizations Business Master File Extract \(EO BMF\): a list of organizations recognized as exempt by the IRS](#)
- [Tax Exempt Organization Search: Bulk Data Downloads](#)

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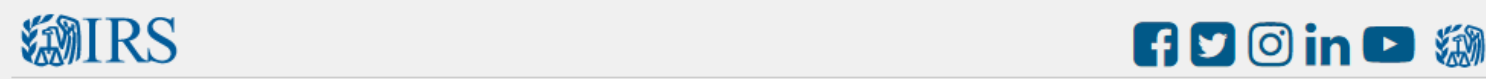
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Contact Your Local Office	Freedom of Information Act	Report Phishing	한국어	
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			Tiếng Việt	
			Kreyòl ayisyen	
			English	
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Exhibit 9



Lin Wood
@LLinWood

Replying to @Courie85 @VP and 2 others

If Pence is arrested, @SecPompeo will save the election. Pence will be in jail awaiting trial for treason. He will face execution by firing squad. He is a coward & will sing like a bird & confess ALL.

1:02 PM · Jan 1, 2021 · Twitter for iPhone

7.6K Retweets **5.8K** Quote Tweets **18.5K** Likes





Lin Wood
@LLinWood

⋮

I believe Chief Justice John Roberts & a multitude of powerful individuals worldwide are being blackmailed in a horrendous scheme involving rape & murder of children captured on videotape.

I have the key to the files containing the videos. I have also shared this information.

2:11 AM · Jan 4, 2021 · Twitter for iPhone

39.4K Retweets **4.4K** Quote Tweets **92.2K** Likes





Exhibit 10



OFFICE OF SECRETARY OF STATE

I, Brad Raffensperger, Secretary of State of the State of Georgia, do hereby certify that

the Dominion Voting System (EAC Certification Number DVS-DemSuite5.5-A), consisting of the Democracy Suite 5.5-A Election Management System Version 5.5.12.1, EMS Adjudication Version 5.5.8.1, ImageCast X Prime (ICX BMD) Ballot Marking Device Version 5.5.10.30, ImageCast Precinct (ICP) Precinct Scanning Device Version 5.5.3-0002, and ImageCast Central (ICC) Central Scanning Device Version 5.5.3-0002, manufactured by Dominion Voting Systems, Inc., 1201 18th Street, STE 210, Denver, Colorado 80202, has been thoroughly examined and tested and found to be in compliance with the applicable provisions of the Georgia Election Code and Rules of the Secretary of State, and as a result of this inspection, it is my opinion that this kind of voting system and its components can be safely used by the electors of this state in all primaries and elections as provided in Chapter 2 of Title 21 of the Official Code of Georgia; provided however, that I hereby reserve my opinion to reexamine this voting system and its components at anytime so as to ensure that it continues to be one that can be safely used by the voters of this state.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seal of my office, at the Capitol, in the City of Atlanta, this 9th day of August, in the year of our Lord Two Thousand and Nineteen and of the Independence of the United States of America the Two Hundred and Forty-Fourth



Brad Raffensperger
Brad Raffensperger, Secretary of State

Exhibit 11

VOTER INFO. RESULTS & STATS CANDIDATE INFO. COUNTY & AGENCY

HISTORIC FIRST STATEWIDE AUDIT OF PAPER BALLOTS UPHOLDS RESULT OF PRESIDENTIAL RACE

(ATLANTA)-Today, Secretary of State Brad Raffensperger announced the results of the Risk Limiting Audit of Georgia's presidential contest, which upheld and reaffirmed the original outcome produced by the machine tally of votes cast. Due to the tight margin of the race and the principles of risk-limiting audits, this audit was a full manual tally of all votes cast. The audit confirmed that the original machine count accurately portrayed the winner of the election. The results of the audit can be viewed [HERE](#), [HERE](#), and [HERE](#).

"Georgia's historic first statewide audit reaffirmed that the state's new secure paper ballot voting system accurately counted and reported results," said Secretary Raffensperger. "This is a credit to the hard work of our county and local elections officials who moved quickly to undertake and complete such a momentous task in a short period of time."

"Georgia's first statewide audit successfully confirmed the winner of the chosen contest and should give voters increased confidence in the results," said Ben Adida, Executive Director of VotingWorks. "We were proud to work with Georgia on this historic audit. The difference between the reported results and the full manual tally is well within the expected error rate of hand-counting ballots, and the audit was a success."

By law, Georgia was required to conduct a Risk Limiting Audit of a statewide race following the November elections. Understanding the importance of clear and reliable results for such an important contest, Secretary Raffensperger selected the presidential race in Georgia for the audit. Meeting the confidence threshold required by law for the audit meant conducting a full manual tally of every ballot cast in Georgia.

The Risk Limiting Audit reaffirmed the outcome of the presidential race in Georgia as originally reported, with Joe Biden leading President Donald Trump in the state.

The audit process also led to counties catching making mistakes they made in their original count by not uploading all memory cards. Those counties uploaded the memory cards and re-certified their results, leading to increased accuracy in the results the state will certify.

The differential of the audit results from the original machine counted results is well within the expected margin of human error that occurs when hand-counting ballots. A 2012 [study](#) by Rice University and Clemson University found that "hand counting of votes in postelection audit or recount procedures can result in error rates of up to 2 percent." In Georgia's recount, the highest error rate in any county recount was .73%. Most counties found no change in their final tally. The majority of the remaining counties had changes of fewer than ten ballots.

Because the margin is still less than 0.5%, the President can request a recount after certification of the results. That recount will be conducted by rescanning all paper ballots.

[Click here for the Risk Limiting Audit Report](#)

###

Key Election Dates and Information

Military and Overseas Voting

Register to Vote

Where do I vote? (MVP)

QUICK LINKS

2020 General Election Risk-Limiting Audit	2020 General Recount Info by County
Risk Limiting Audit Public Notice	2020 Presidential Electors
GA Voter ID Info.	State Election Board
Elections Advisory Council	Secure The Vote
2019 Official Directory	Vote Safe
SAFE Commission	Voter Registration Drive
Stop Voter Fraud	Reexamination Costs
Online Complaints	Information for Voter Registrations Pending Due to Citizenship
Proposed Constitutional Amendments	Intent to Tabulate Early
Great Seal	SD 4 Qualified Candidates
IVote - Students / Educators	Advance Voting Info.
Check Your Provisional Ballot Status for November 6, 2018 Election	2019 List Maintenance
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LATEST ELECTIONS NEWS

- Secretary Raffensperger Cracks Down on "Line Warming" Loophole
Tuesday, December 29th 2020
- Obama-Appointed Judge Strikes Blow to Rule of Law in Georgia Elections
Tuesday, December 29th 2020
- Lin Wood Tossed Out of Court Again, Georgia Rule of Law Upheld

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Tuesday, December 29th 2020

Lin Wood Tossed Out of Court Again, Georgia Rule of Law Upheld
Monday, December 28th 2020

Georgia's Elections Officials are Overwhelmed Running Three Parallel Election
Wednesday, December 23rd 2020

Secretary Raffensperger Leads Full-Scale Investigation to Combat Illegal Voting
Tuesday, December 22nd 2020

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Exhibit 12



3RD STRIKE AGAINST VOTER FRAUD CLAIMS MEANS THEY'RE OUT AFTER SIGNATURE AUDIT FINDS NO FRAUD

No fraudulent absentee ballots were identified during the audit.

(ATLANTA)-After a hand recount and a subsequent machine recount requested by the Trump campaign, a signature audit has again affirmed the original outcome of the November 2020 presidential race in Georgia. A signature match audit in Cobb County found "no fraudulent absentee ballots" and found that the Cobb County Elections Department had "a 99.99% accuracy rate in performing correct signature verification procedures."

"The Secretary of State's office has always been focused on calling balls and strikes in elections and, in this case, three strikes against the voter fraud claims and they're out," said Secretary of State Brad Raffensperger. "We conducted a statewide hand recount that reaffirmed the initial tally, and a machine recount at the request of the Trump campaign that also reaffirmed the original tally. This audit disproves the only credible allegations the Trump campaign had against the strength of Georgia's signature match processes."

On December 14, 2020, Secretary Raffensperger announced a signature match audit in Cobb County following credible allegations that the process was not followed in the June primaries. The Secretary of State's Office partnered with the Georgia Bureau of Investigation (GBI) to conduct the audit. Of the 150,431 absentee ballots received by Cobb County elections officials during the November elections, the audit "reviewed 15,118 ABM ballot oath envelopes from randomly selected boxes," or around 10% of the total. The sample size was originally chosen to meet the 99% confidence threshold.

The audit found "no fraudulent absentee ballots" with a 99% confidence threshold. The audit found that only two ballots should have been identified by Cobb County Elections Officials for cure notification that weren't. In one case, the ballot was "mistakenly signed by the elector's spouse," and in the other, the voter "reported signing the front of the envelope only." In both cases, the identified voters filled out the ballots themselves.

The absentee ballot envelopes for the audit were "pulled from 30 randomly selected boxes of the accepted ABM ballots and one box identified as accepted Electronic Ballot Delivery ABM ballots." Each of the boxes that held the ballots were previously "secured in boxes by the Cobb County Elections Department" and were selected by a random number generator.

To conduct the audit, Law Enforcement Officers (LEOs), from GBI and SOS were instructed to "analyze and compare the known signatures, markings, and identifying information of the elector as stored in databases with the signature, markings, and identifying information on the elector's ABM ballot oath envelope." They looked for "distinctive characteristics and unique qualities ... individual attributes of the signature, mark, or other identifying information" to "make a judgment of the validity of the signature on each envelope based on the totality of the documents."

The LEOs conducting the audit were split "into 18 two-member teams identified as 'inspection teams' and two three-member teams identified as 'investigation teams.'" If the two members of the inspection team were split on whether a ballot signature was valid, a third impartial "referee" was brought in to

Key Election Dates and Information

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QUICK LINKS

2020 General Election
Risk-Limiting Audit

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Info by County

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LATEST ELECTIONS NEWS

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In cases where additional review was necessary, if no signature was on the ballot, or if additional identification documents were not available, the absentee ballots were given to the investigation teams to track down more information.

The inspection teams submitted 396 envelopes to the investigation teams for comparison with additional documents or follow-up with the elector." 386 of those were accepted as valid. The remaining ten were referred for additional investigation. "All ten electors were located, positively identified, and interviewed."

The LEOs used the Cobb County Elections Database which included signature information from voter registration forms, absentee ballot applications, voter certificates, passports, certificates of naturalization, in addition to other documents.

The full report is available here:
<https://sos.ga.gov/admin/uploads/Cobb%20County%20ABM%20Audit%20Report%2020201229.pdf>

Georgia is recognized as a national leader in elections. It was the first state in the country to implement the trifecta of automatic voter registration, at least 16 days of early voting (which has been called the "gold standard"), and no-excuse absentee voting. Georgia continues to set records for voter turnout and election participation, seeing the largest increase in average turnout of any other state in the 2018 midterm election and record turnout in 2020, with over 1.3 million absentee by mail voters and over 3.6 million in-person voters utilizing Georgia's new, secure, paper ballot voting system.

###

Notice	Elections
Stop Voter Fraud	Secure The Vote
Elections Advisory Council	Secure The Vote
2019 Official Directory	Vote Safe
SAFE Commission	Voter Registration Drive
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3rd Strike Against Voter Fraud Claims Means They're Out After Signature Audit Finds No Fraud Tuesday, December 29th 2020

Secretary Raffensperger Cracks Down on "Line Warming" Loophole Tuesday, December 29th 2020

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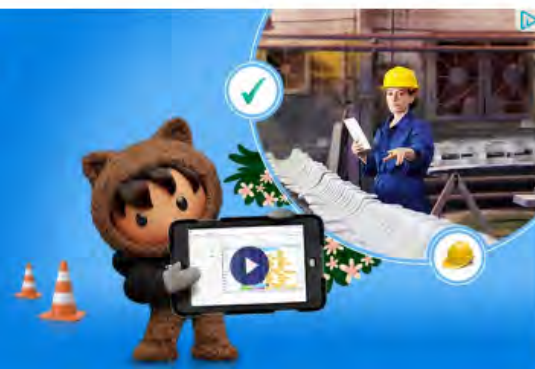
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Exhibit 13

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Politics

Here's the full transcript and audio of the call between Trump and Raffensperger

Audio: Trump's full Jan. 2 call with Ga. secretary of state



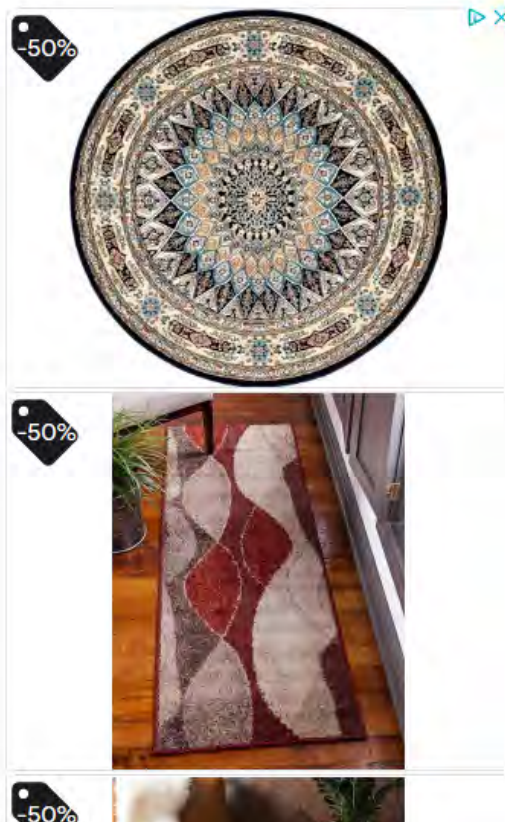
Listen to the full Jan. 2 phone call. This audio has been edited to remove the name of an individual about whom the president makes unsubstantiated allegations. (Obtained by The Washington Post)

By **Amy Gardner** and **Paulina Firozi**

Jan. 3, 2021 at 9:15 p.m. GMT

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About 3 p.m. Saturday, President Trump held an hour-long call with Brad Raffensperger, Georgia's secretary of state,



Jan. 3, 2021 at 9:15 p.m. GMT

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About 3 p.m. Saturday, President Trump held an hour-long call with Brad Raffensperger, Georgia's secretary of state, in which he repeatedly urged him to alter the outcome of the presidential vote in the state. He was joined on the call by White House Chief of Staff Mark Meadows and several lawyers, including longtime conservative attorney Cleta Mitchell and Georgia-based attorney Kurt Hilbert. Raffensperger was joined by his office's general counsel, Ryan Germany, and Deputy Secretary of State Jordan Fuchs.

The Washington Post obtained a copy of a recording of the call. This transcript has been edited to remove the name of an individual about whom Trump makes unsubstantiated claims.

Meadows: Okay. Alright. Mr. President, everyone is on the line. This is Mark Meadows, the chief of staff. Just so we all are aware. On the line is secretary of state and two other individuals. Jordan and Mr. Germany with him. You also have the attorneys that represent the president, Kurt and Alex and Cleta Mitchell — who is not the attorney of record but has been involved — myself and then the president. So Mr. President, I'll turn it over to you.

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1 Here's the full transcript and audio of the call between Trump and Raffensperger

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3 Cleta Mitchell, a key



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President Trump had an hour-long conversation with the Georgia secretary of state Saturday. (Alex Edelman/Getty Images)

Trump: Okay, thank you very much. Hello Brad and Ryan and everybody. We appreciate the time and the call. So we've spent a lot of time on this, and if we could just go over some of the

numbers, I think it's pretty clear that we won. We won very substantially in Georgia. You even see it by rally size, frankly. We'd be getting 25-30,000 people a rally, and the competition would get less than 100 people. And it never made sense.

But we have a number of things. We have at least 2 or 3 — anywhere from 250 to 300,000 ballots were dropped mysteriously into the rolls. Much of that had to do with Fulton County, which hasn't been checked. We think that if you check the signatures — a real check of the signatures going back in Fulton County — you'll find at least a couple of hundred thousand of forged signatures of people who have been forged. And we are quite sure that's going to happen.

Another tremendous number. We're going to have an accurate number over the next two days with certified accountants. But an accurate number will be given, but it's in the 50s of thousands — and that's people that went to vote and they were told they can't vote because they've already been voted for. And it's a very sad thing. They walked out complaining. But the number's large. We'll have it for you

Speaker of the U.S. Senate hangs in the balance as polls open

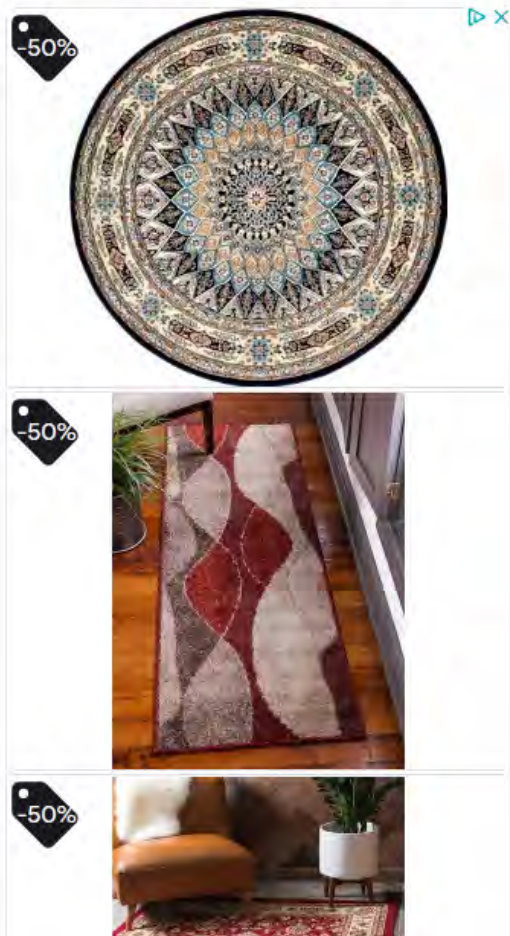
- 3 Cleta Mitchell, a key figure in president's phone call, was an early backer of Trump's election fraud claims



- 4 Trump sabotaging GOP on his way out of office with push to overturn election



- 5 'I just want to find 11,780 votes': In extraordinary hour-long call, Trump pressures Georgia secretary of state to recalculate the vote in his favor





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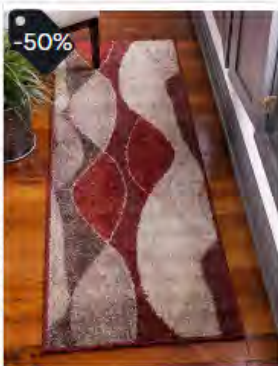


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the 50s of thousands — and that's people that went to vote and they were told they can't vote because they've already been voted for. And it's a very sad thing. They walked out complaining. But the number's large. We'll have it for you. But it's much more than the number of 11,779 that's — the current margin is only 11,779. Brad, I think you agree with that, right? That's something I think everyone — at least that's a number that everyone agrees on.



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But that's the difference in the votes. But we've had hundreds of thousands of ballots that we're able to actually — we'll get you a pretty accurate number. You don't need much of a number because the number that in theory I lost by, the margin would be 11,779. But you also have a substantial numbers of people, thousands and thousands, who went to the voting place on November 3, were told they couldn't vote, were told they couldn't vote because a ballot had been put on their name. And you know that's very, very, very, very sad.

We had, I believe it's about 4,502 voters who voted but who weren't on the voter registration list, so it's 4,502 who voted, but they weren't on the voter registration roll, which they had to be. You had 18,325 vacant address voters. The address was vacant, and they're not allowed to be counted. That's 18,325.

Smaller number — you had 904 who only voted where they



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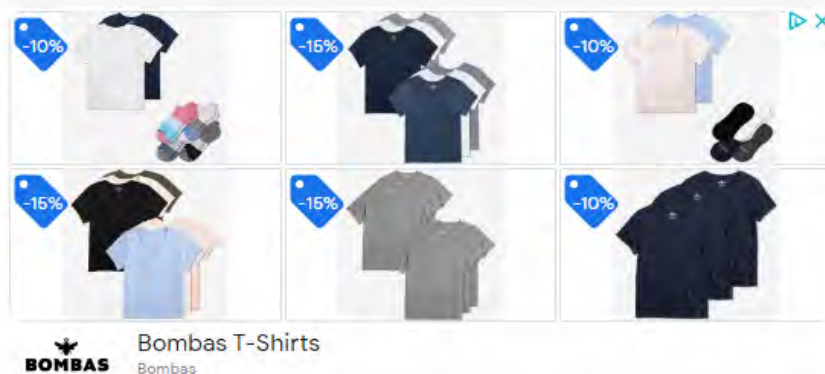
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to be. You had 18,325 vacant address voters. The address was vacant, and they're not allowed to be counted. That's 18,325.

Smaller number — you had 904 who only voted where they had just a P.O. — a post office box number — and they had a post office box number, and that's not allowed. We had at least 18,000 — that's on tape, we had them counted very painstakingly — 18,000 voters having to do with [name]. She's a vote scammer, a professional vote scammer and hustler [name]. That was the tape that's been shown all over the world that makes everybody look bad, you, me and everybody else.



Where they got — number one they said very clearly and it's been reported that they said there was a major water main break. Everybody fled the area. And then they came back, [name] and her daughter and a few people. There were no Republican poll watchers. Actually, there were no Democrat poll watchers, I guess they were them. But there were no Democrats, either, and there was no law enforcement. Late in the morning, early in the morning, they went to the table with the black robe and the black shield, and they pulled out the votes. Those votes were put there a number of hours before — the table was put there — I think it was, Brad, you would know, it was probably eight hours or seven hours before, and then it was stuffed with votes.

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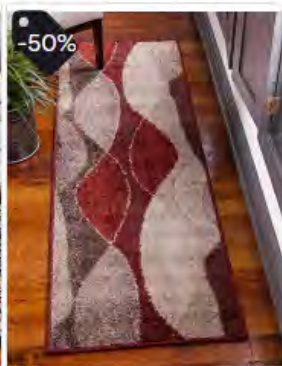
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votes. Those votes were put there a number of hours before — the table was put there — I think it was, Brad, you would know, it was probably eight hours or seven hours before, and then it was stuffed with votes.

They weren't in an official voter box; they were in what looked to be suitcases or trunks, suitcases, but they weren't in voter boxes. The minimum number it could be because we watched it, and they watched it certified in slow motion instant replay if you can believe it, but slow motion, and it was magnified many times over, and the minimum it was 18,000 ballots, all for Biden.

You had out-of-state voters. They voted in Georgia, but they were from out of state, of 4,925. You had absentee ballots sent to vacant, they were absentee ballots sent to vacant addresses. They had nothing on them about addresses, that's 2,326.



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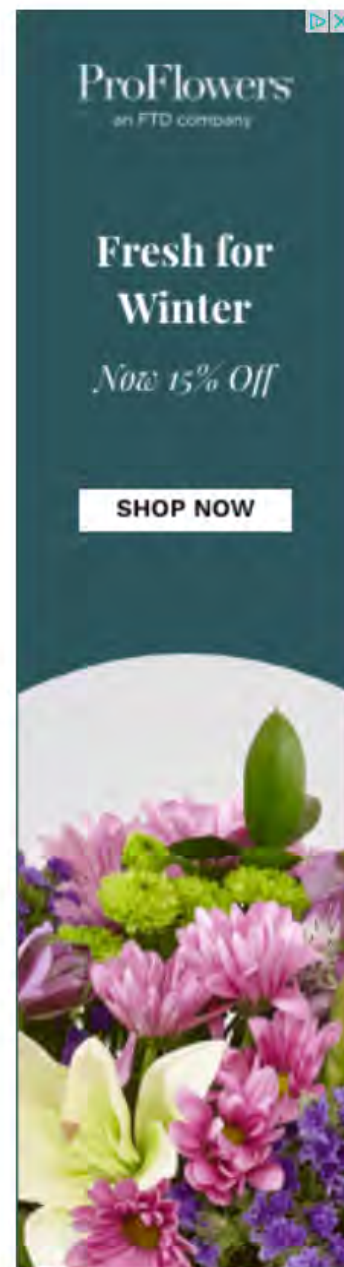
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And you had dropboxes, which is very bad. You had dropboxes that were picked up. We have photographs, and we have affidavits from many people.

I don't know if you saw the hearings, but you have dropboxes where the box was picked up but not delivered for three days. So all sorts of things could have happened to that box,

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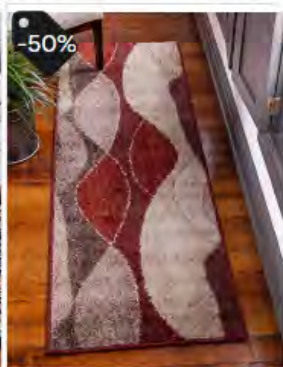
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I don't know if you saw the hearings, but you have dropboxes where the box was picked up but not delivered for three days. So all sorts of things could have happened to that box, including, you know, putting in the votes that you wanted. So there were many infractions, and the bottom line is, many, many times the 11,779 margin that they said we lost by — we had vast, I mean the state is in turmoil over this.

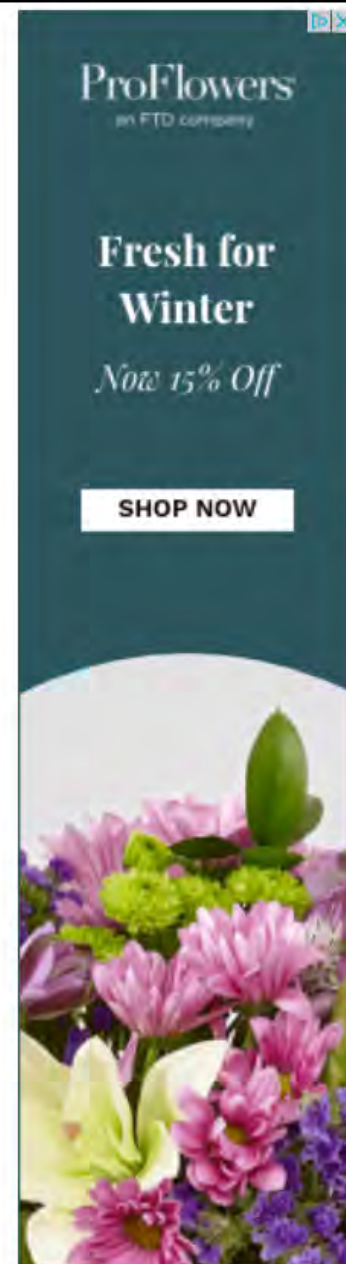
And I know you would like to get to the bottom of it, although I saw you on television today, and you said that you found nothing wrong. I mean, you know, and I didn't lose the state, Brad. People have been saying that it was the highest vote ever. There was no way. A lot of the political people said that there's no way they beat me. And they beat me. They beat me in the . . . As you know, every single state, we won every state. We won every statehouse in the country. We held the Senate, which is shocking to people, although we'll see what happens tomorrow or in a few days.



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And we won the House, but we won every single statehouse, and we won Congress, which was supposed to lose 15 seats, and they gained, I think 16 or 17 or something. I think there's a now difference of five. There was supposed to be a difference substantially more. But politicians in every state, but politicians in Georgia have given affidavits and are going





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a now difference of five. There was supposed to be a difference substantially more. But politicians in every state, but politicians in Georgia have given affidavits and are going to that, that there was no way that they beat me in the election, that the people came out, in fact, they were expecting to lose, and then they ended up winning by a lot because of the coattails. And they said there's no way, that they've done many polls prior to the election, that there was no way that they won.

Ballots were dropped in massive numbers. And we're trying to get to those numbers and we will have them.

They'll take a period of time. Certified. But but they're massive numbers. And far greater than the 11,779.

AD



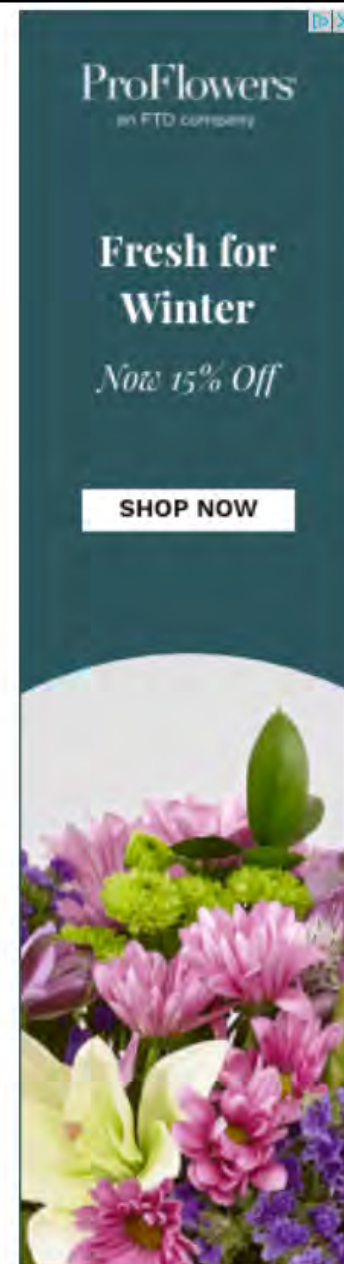
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The other thing, dead people. So dead people voted, and I think the number is close to 5,000 people. And they went to obituaries. They went to all sorts of methods to come up with an accurate number, and a minimum is close to about 5,000 voters.

The bottom line is, when you add it all up and then you start adding, you know, 300,000 fake ballots. Then the other thing they said is in Fulton County and other areas. And this may or may not be true. This just came up this morning that





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The bottom line is, when you add it all up and then you start adding, you know, 300,000 fake ballots. Then the other thing they said is in Fulton County and other areas. And this may or may not be true . . . this just came up this morning, that they are burning their ballots, that they are shredding, shredding ballots and removing equipment. They're changing the equipment on the Dominion machines and, you know, that's not legal.

And they supposedly shredded I think they said 300 pounds of, 3,000 pounds of ballots. And that just came to us as a report today. And it is a very sad situation.

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But Brad, if you took the minimum numbers where many, many times above the 11,779, and many of those numbers are certified, or they will be certified, but they are certified. And those are numbers that are there, that exist. And that beat the margin of loss, they beat it, I mean, by a lot, and people should be happy to have an accurate count instead of an election where there's turmoil.

I mean there's turmoil in Georgia and other places. You're not the only one, I mean, we have other states that I believe will be flipping to us very shortly. And this is something that — you know, as an example, I think it in Detroit, I think there's a section, a good section of your state actually, which

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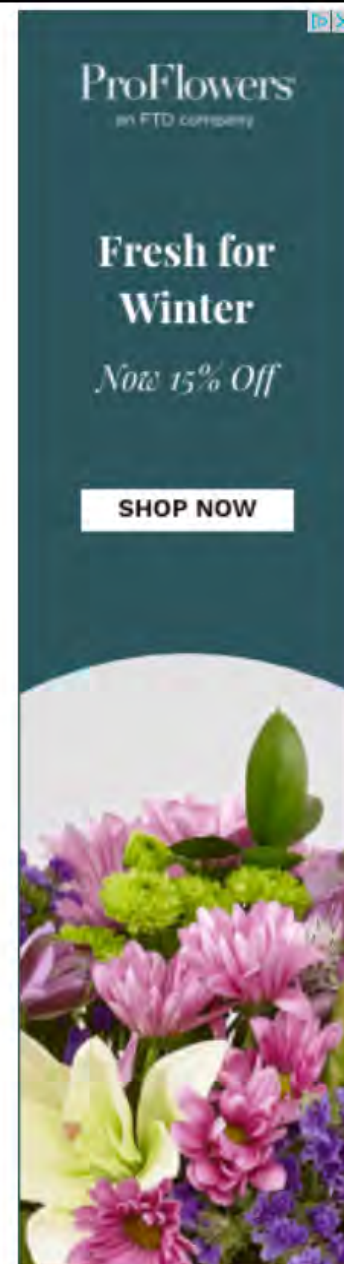
not the only one, I mean, we have other states that I believe will be flipping to us very shortly. And this is something that — you know, as an example, I think it in Detroit, I think there's a section, a good section of your state actually, which we're not sure so we're not going to report it yet. But in Detroit, we had, I think it was, 139 percent of the people voted. That's not too good.

In Pennsylvania, they had well over 200,000 more votes than they had people voting. And that doesn't play too well, and the legislature there is, which is Republican, is extremely activist and angry. I mean, there were other things also that were almost as bad as that. But they had as an example, in Michigan, a tremendous number of dead people that voted. I think it was, I think, Mark, it was 18,000. Some unbelievably high number, much higher than yours, you were in the 4-5,000 category.



And that was checked out laboriously by going through, by going through the obituary columns in the newspapers.

So I guess with all of it being said, Brad, the bottom line, and provisional ballots, again, you know, you'll have to tell me about the provisional ballots, but we have a lot of people that were complaining that they weren't able to vote because they were already voted for. These are great people.





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about the provisional ballots, but we have a lot of people that were complaining that they weren't able to vote because they were already voted for. These are great people.

And, you know, they were shellshocked. I don't know if you call that provisional ballots. In some states, we had a lot of provisional ballot situations where people were given a provisional ballot because when they walked in on November 3 and they were already voted for.

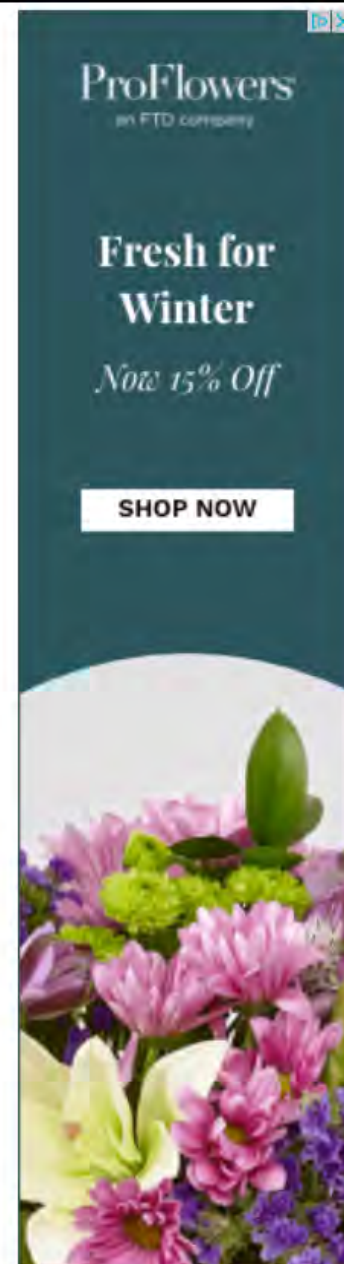
So that's it. I mean, we have many, many times the number of votes necessary to win the state. And we won the state, and we won it very substantially and easily, and we're getting, we have, much of this is a very certified, far more certified than we need. But we're getting additional numbers certified, too. And we're getting pictures of dropboxes being delivered and delivered late. Delivered three days later, in some cases, plus we have many affidavits to that effect.

[\[Election results under attack: Here are the facts\]](#)

Meadows: So, Mr. President, if I might be able to jump in, and I'll give Brad a chance. Mr. Secretary, obviously there is, there are allegations where we believe that not every vote or fair vote and legal vote was counted, and that's at odds with the representation from the secretary of state's office.

What I'm hopeful for is there some way that we can, we can find some kind of agreement to look at this a little bit more fully? You know the president mentioned Fulton County.

But in some of these areas where there seems to be a difference of where the facts seem to lead, and so Mr. Secretary, I was hopeful that, you know, in the spirit of cooperation and compromise, is there something that we can at least have a discussion to look at some of these allegations





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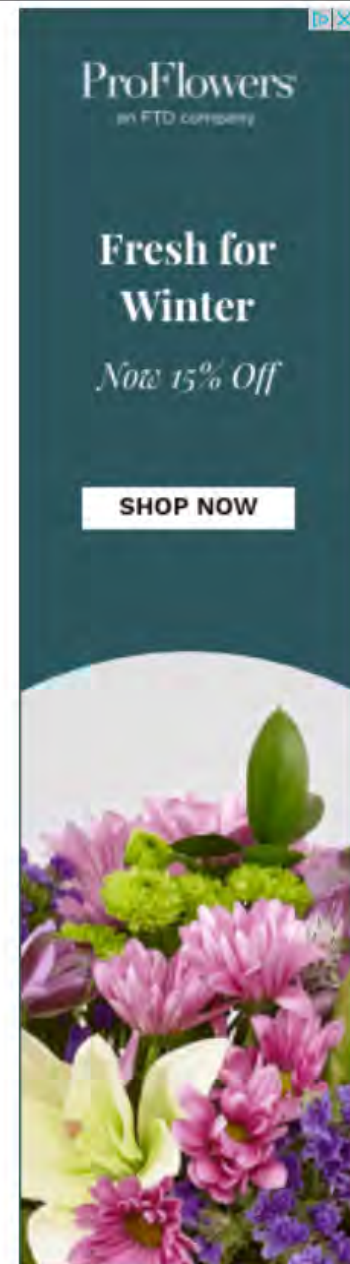
Secretary, I was hopeful that, you know, in the spirit of cooperation and compromise, is there something that we can at least have a discussion to look at some of these allegations to find a path forward that's less litigious?

Raffensperger: Well, I listened to what the president has just said. President Trump, we've had several lawsuits, and we've had to respond in court to the lawsuits and the contentions. We don't agree that you have won. And we don't — I didn't agree about the 200,000 number that you'd mentioned. I'll go through that point by point.

What we have done is we gave our state Senate about one and a half hours of our time going through the election issue by issue and then on the state House, the government affairs committee, we gave them about two and a half hours of our time, going back point by point on all the issues of contention. And then just a few days ago, we met with our U.S. congressmen, Republican congressmen, and we gave them about two hours of our time talking about this past election. Going back, primarily what you've talked about here focused in on primarily, I believe, is the absentee ballot process. I don't believe that you're really questioning the Dominion machines. Because we did a hand re-tally, a 100 percent re-tally of all the ballots, and compared them to what the machines said and came up with virtually the same result. Then we did the recount, and we got virtually the same result. So I guess we can probably take that off the table.

I don't think there's an issue about that.

Trump: Well, Brad. Not that there's not an issue, because we have a big issue with Dominion in other states and perhaps in yours. But we haven't felt we needed to go there. And just to, you know, maybe put a little different spin on what Mark is





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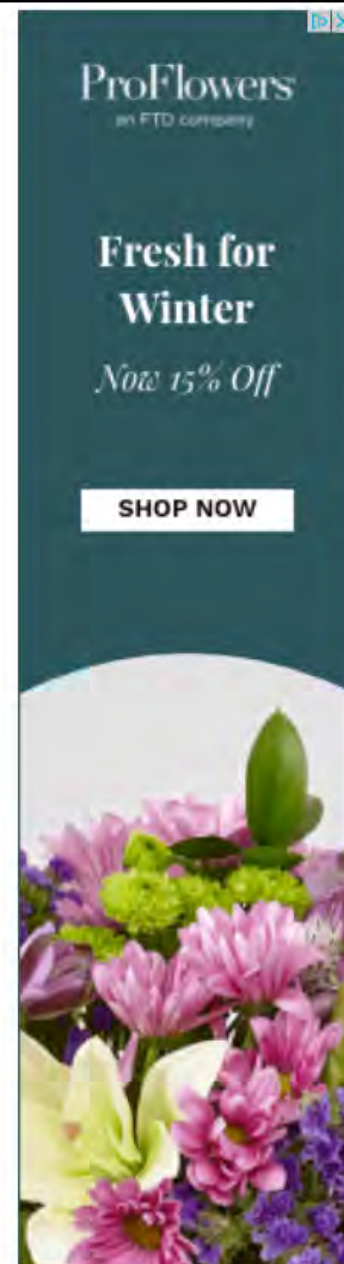
have a big issue with Dominion in other states and perhaps in yours. But we haven't felt we needed to go there. And just to, you know, maybe put a little different spin on what Mark is saying, Mark Meadows, yeah we'd like to go further, but we don't really need to. We have all the votes we need.

You know, we won the state. If you took, these are the most minimal numbers, the numbers that I gave you, those are numbers that are certified, your absentee ballots sent to vacant addresses, your out-of-state voters, 4,925. You know when you add them up, it's many more times, it's many times the 11,779 number. So we could go through, we have not gone through your Dominion. So we can't give them blessing. I mean, in other states, we think we found tremendous corruption with Dominion machines, but we'll have to see.

But we only lost the state by that number, 11,000 votes, and 779. So with that being said, with just what we have, with just what we have, we're giving you minimal, minimal numbers. We're doing the most conservative numbers possible; we're many times, many, many times above the margin. And so we don't really have to, Mark, I don't think we have to go through ...

Meadows: Right

Trump: Because what's the difference between winning the election by two votes and winning it by half a million votes. I think I probably did win it by half a million. You know, one of the things that happened, Brad, is we have other people coming in now from Alabama and from South Carolina and from other states, and they're saying it's impossible for you to have lost Georgia. We won. You know in Alabama, we set a record, got the highest vote ever. In Georgia, we set a record with a massive amount of votes. And they say it's not possible





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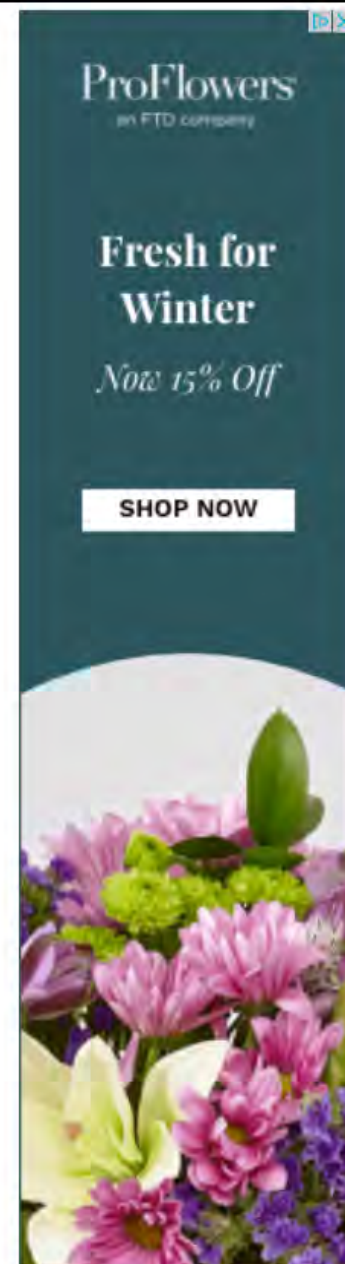
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have lost Georgia. We won. You know in Alabama, we set a record, got the highest vote ever. In Georgia, we set a record with a massive amount of votes. And they say it's not possible to have lost Georgia.

And I could tell you by our rallies. I could tell you by the rally I'm having on Monday night, the place, they already have lines of people standing out front waiting. It's just not possible to have lost Georgia. It's not possible. When I heard it was close, I said there's no way. But they dropped a lot of votes in there late at night. You know that, Brad. And that's what we are working on very, very stringently. But regardless of those votes, with all of it being said, we lost by essentially 11,000 votes, and we have many more votes already calculated and certified, too.

And so I just don't know, you know, Mark, I don't know what's the purpose. I won't give Dominion a pass because we found too many bad things. But we don't need Dominion or anything else. We have won this election in Georgia based on all of this. And there's nothing wrong with saying that, Brad. You know, I mean, having the correct — the people of Georgia are angry. And these numbers are going to be repeated on Monday night. Along with others that we're going to have by that time, which are much more substantial even. And the people of Georgia are angry, the people of the country are angry. And there's nothing wrong with saying that, you know, that you've recalculated. Because the 2,236 in absentee ballots. I mean, they're all exact numbers that were done by accounting firms, law firms, etc. And even if you cut 'em in half, cut 'em in half and cut 'em in half again, it's more votes than we need.

Raffensperger: Well, Mr. President, the challenge that you have is the data you have is wrong. We talked to the



than we need.

Raffensperger: Well, Mr. President, the challenge that you have is the data you have is wrong. We talked to the congressmen, and they were surprised.

But they — I guess there was a person named Mr. Braynard who came to these meetings and presented data, and he said that there was dead people, I believe it was upward of 5,000. The actual number were two. Two. Two people that were dead that voted. So that's wrong.

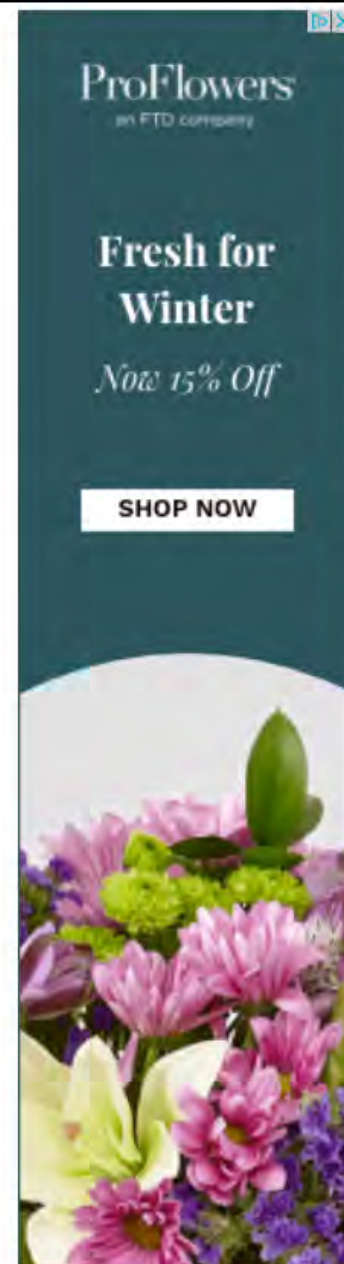
Trump: Well, Cleta, how do you respond to that? Maybe you tell me?

Mitchell: Well, I would say, Mr. Secretary, one of the things that we have requested and what we said was, if you look, if you read our petition, it said that we took the names and birth years, and we had certain information available to us. We have asked from your office for records that only you have, and so we said there is a universe of people who have the same name and same birth year and died.

But we don't have the records that you have. And one of the things that we have been suggesting formally and informally for weeks now is for you to make available to us the records that would be necessary —

[Cleta Mitchell, a key figure in president's phone call, was an early backer of Trump's election fraud claims]

Trump: But, Cleta, even before you do that, and not even including that, that's why I hardly even included that number, although in one state, we have a tremendous amount of dead people. So I don't know — I'm sure we do in Georgia, too. I'm sure we do in Georgia, too.





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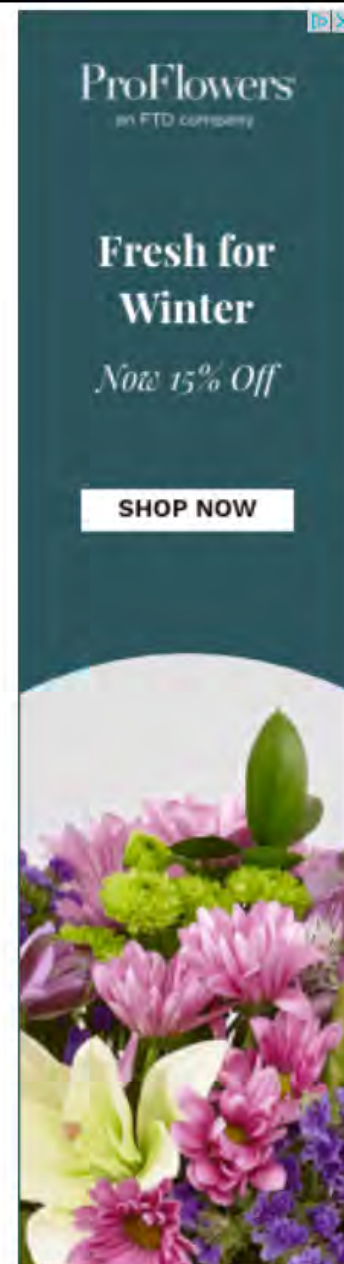
number, although in one state, we have a tremendous amount of dead people. So I don't know — I'm sure we do in Georgia, too. I'm sure we do in Georgia, too.

But we're so far ahead. We're so far ahead of these numbers, even the phony ballots of [name] , known scammer. You know the Internet? You know what was trending on the Internet? "Where's [name]?" Because they thought she'd be in jail. "Where's [name]?" It's crazy, it's crazy. That was. The minimum number is 18,000 for [name] , but they think it's probably about 56,000, but the minimum number is 18,000 on the [name] night where she ran back in there when everybody was gone and stuffed, she stuffed the ballot boxes. Let's face it, Brad, I mean. They did it in slow motion replay magnified, right? She stuffed the ballot boxes. They were stuffed like nobody has ever seen them stuffed before.

So there's a term for it when it's a machine instead of a ballot box, but she stuffed the machine. She stuffed the ballot. Each ballot went three times, they were showing: Here's ballot No 1. Here it is a second time, third time, next ballot.

I mean, look. Brad. We have a new tape that we're going to release. It's devastating. And by the way, that one event, that one event is much more than the 11,000 votes that we're talking about. It's, you know, that one event was a disaster. And it's just, you know, but it was, it was something, it can't be disputed. And again, we have a version that you haven't seen, but it's magnified. It's magnified, and you can see everything. For some reason, they put it in three times, each ballot, and I don't know why. I don't know why three times. Why not five times, right? Go ahead.

Raffensperger: You're talking about the State Farm video. And I think it's extremely unfortunate that Rudy Giuliani or his people. they sliced and diced that video and took it out of





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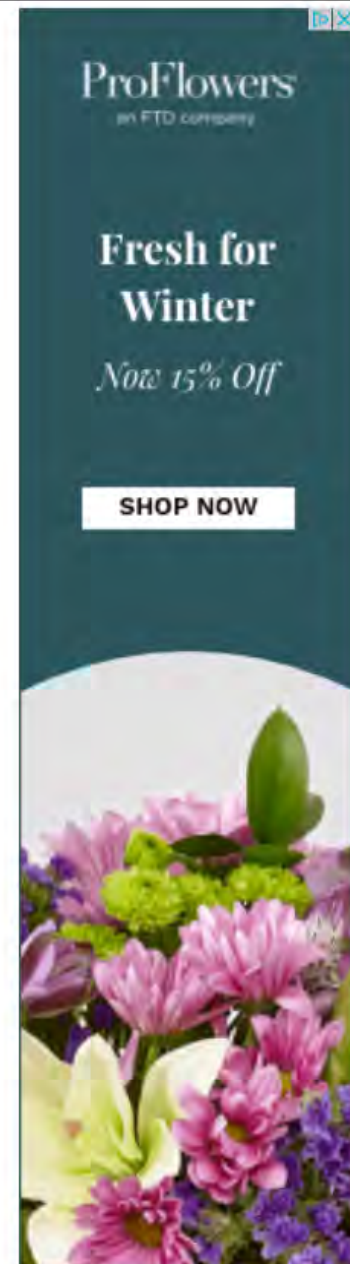
Raffensperger: You're talking about the State Farm video. And I think it's extremely unfortunate that Rudy Giuliani or his people, they sliced and diced that video and took it out of context. The next day, we brought in WSB-TV, and we let them show, see the full run of tape, and what you'll see, the events that transpired are nowhere near what was projected by, you know —

Trump: But where were the poll watchers, Brad? There were no poll watchers there. There were no Democrats or Republicans. There was no security there.

It was late in the evening, late in the, early in the morning, and there was nobody else in the room. Where were the poll watchers, and why did they say a water main broke, which they did and which was reported in the newspapers? They said they left. They ran out because of a water main break, and there was no water main. There was nothing. There was no break. There was no water main break. But we're, if you take out everything, where were the Republican poll watchers, even where were the Democrat pollwatchers, because there were none.

And then you say, well, they left their station, you know, if you look at the tape, and this was, this was reviewed by professional police and detectives and other people, when they left in a rush, everybody left in a rush because of the water main, but everybody left in a rush. These people left their station.

When they came back, they didn't go to their station. They went to the apron, wrapped around the table, under which were thousands and thousands of ballots in a box that was not an official or a sealed box. And then they took those. They went back to a different station. So if they would have come





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went to the apron, wrapped around the table, under which were thousands and thousands of ballots in a box that was not an official or a sealed box. And then they took those. They went back to a different station. So if they would have come back, they would have walked to their station, and they would have continued to work. But they couldn't do even that because that's illegal, because they had no Republican pollwatchers. And remember, her reputation is — she's known all over the Internet, Brad. She's known all over.

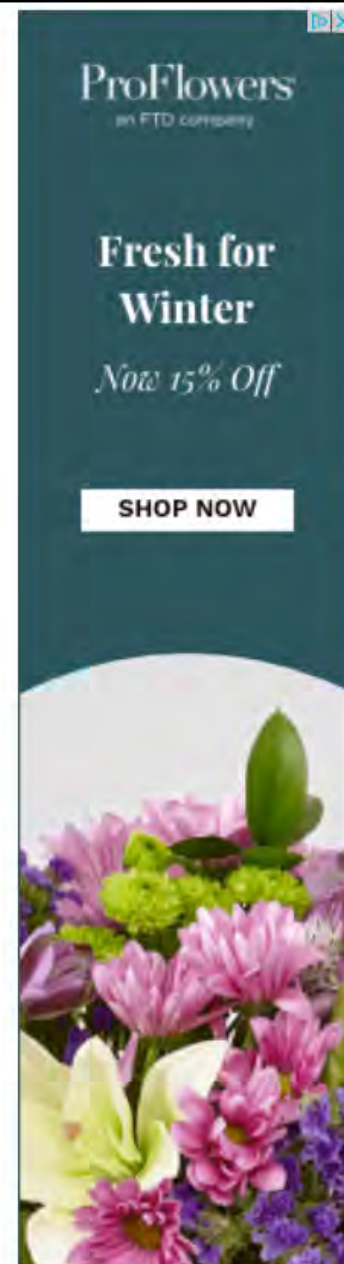
I'm telling you, "Where's [name]" was one of the hot items . . . [name] They knew her. "Where's [name]?" So Brad, there can be no justification for that. And I, you know, I give everybody the benefit of the doubt. But that was — and Brad, why did they put the votes in three times? You know, they put 'em in three times.

Raffensperger: Mr. President, they did not put that. We did an audit of that, and we proved conclusively that they were not scanned three times.

Trump: Where was everybody else at that late time in the morning? Where was everybody? Where were the Republicans? Where were the security guards? Were the people that were there just a little while before when everyone ran out of the room. How come we had no security in the room. Why did they run to the bottom of the table? Why do they run there and just open the skirt and rip out the votes. I mean, Brad. And they were sitting there, I think for five hours or something like that, the votes.

Raffensperger: Mr. President, we'll send you the link from WSB.

Trump: I don't care about the link. I don't need it. Brad, I have a much better —





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Trump: I don't care about the link. I don't need it. Brad, I have a much better —

Mitchell: I will tell you. I've seen the tape. The full tape. So has Alex. We've watched it. And what we saw and what we've confirmed in the timing is that they made everybody leave — we have sworn affidavits saying that. And then they began to process ballots. And our estimate is that there were roughly 18,000 ballots. We don't know that. If you know that . . .

Trump: It was 18,000 ballots, but they used each one three times.

Mitchell: Well, I don't know about that.

Trump: I do think we had ours magnified out.

Mitchell: I've watched the entire tape.

Trump: Nobody can make a case for that, Brad. Nobody. I mean, look, you'd have to be a child to think anything other than that. Just a child.

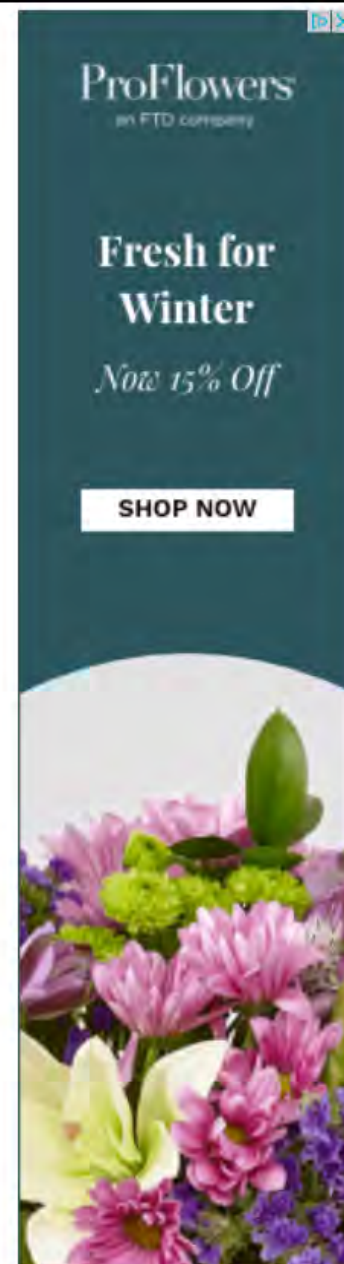
Mitchell: How many ballots, Mr. Secretary, are you saying were processed then?

Raffensperger: We had GBI . . . investigate that.

Germany: We had our — this is Ryan Germany. We had our law enforcement officers talk to everyone who was, who was there after that event came to light. GBI was with them as well as FBI agents.

Trump: Well, there's no way they could — then they're incompetent. They're either dishonest or incompetent, okay?

Mitchell: Well, what did they find?





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Trump: Well, there's no way they could — then they're incompetent. They're either dishonest or incompetent, okay?

Mitchell: Well, what did they find?

Trump: There's only two answers, dishonesty or incompetence. There's just no way. Look. There's no way. And on the other thing, I said too, there is no way. I mean, there's no way that these things could have been, you know, you have all these different people that voted, but they don't live in Georgia anymore. What was that number, Cleta? That was a pretty good number, too.

Mitchell: The number who have registered out of state after they moved from Georgia. And so they had a date when they moved from Georgia, they registered to vote out of state, and then it's like 4,500, I don't have that number right in front of me.

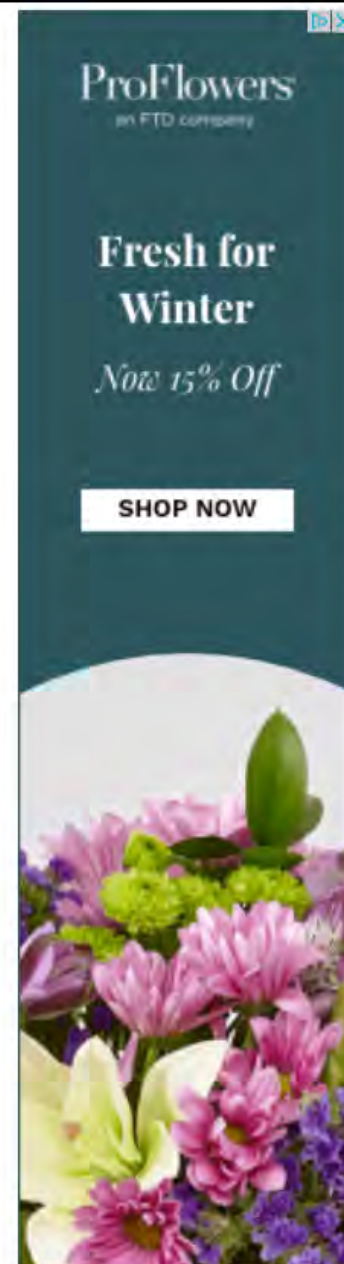
Trump: And then they came back in, and they voted.

Mitchell: And voted. Yeah.

Trump: I thought that was a large number, though. It was in the 20s.

Germany: We've been going through each of those as well, and those numbers that we got, that Ms. Mitchell was just saying, they're not accurate. Every one we've been through are people that lived in Georgia, moved to a different state, but then moved back to Georgia legitimately. And in many cases —

Trump: How may people do that? They moved out, and then they said, "Ah, to hell with it, I'll move back." You know, it doesn't sound like a very normal . . . you mean, they moved out and what they missed it so much that they wanted to





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Trump: How may people do that? They moved out, and then they said, “Ah, to hell with it, I’ll move back.” You know, it doesn’t sound like a very normal . . . you mean, they moved out, and what, they missed it so much that they wanted to move back in? It’s crazy.

Germany: They moved back in years ago. This was not like something just before the election. So there’s something about that data that, it’s just not accurate.

Trump: Well, I don’t know, all I know is that it is certified. And they moved out of Georgia, and they voted. It didn’t say they moved back in, Cleta, did it?

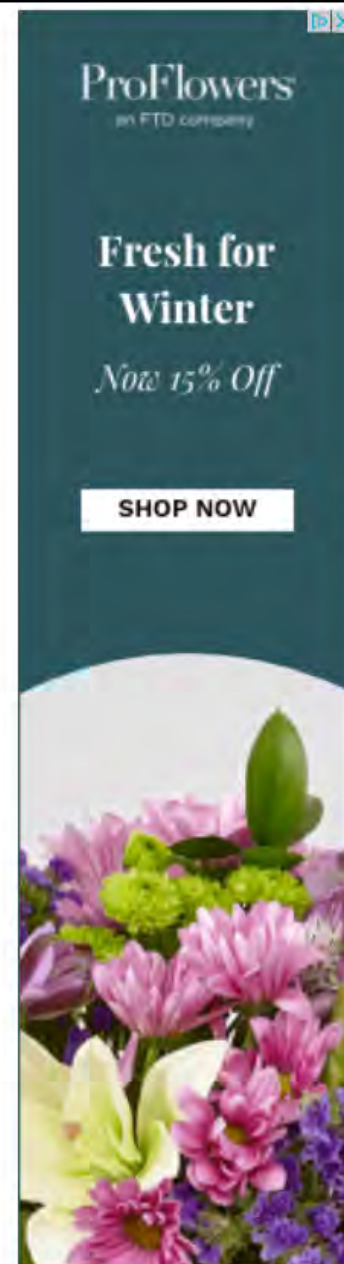
[*\[Fact-checking Trump’s call to the Georgia secretary of state\]*](#)

Mitchell: No, but I mean, we’re looking at the voter registration. Again, if you have additional records, we’ve been asking for that, but you haven’t shared any of that with us. You just keep saying you investigated the allegations.

Trump: Cleta, a lot of it you don’t need to be shared. I mean, to be honest, they should share it. They should share it because you want to get to an honest election.

I won this election by hundreds of thousands of votes. There’s no way I lost Georgia. There’s no way. We won by hundreds of thousands of votes. I’m just going by small numbers, when you add them up, they’re many times the 11,000. But I won that state by hundreds of thousands of votes.

Do you think it’s possible that they shredded ballots in Fulton County? Because that’s what the rumor is. And also that Dominion took out machines. That Dominion is really moving fast to get rid of their, uh, machinery.





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County? Because that's what the rumor is. And also that Dominion took out machines. That Dominion is really moving fast to get rid of their, uh, machinery.

Do you know anything about that? Because that's illegal, right?

Germany: This is Ryan Germany. No, Dominion has not moved any machinery out of Fulton County.

Trump: But have they moved the inner parts of the machines and replaced them with other parts?

Germany: No.

Trump: Are you sure, Ryan?

Germany: I'm sure. I'm sure, Mr. President.

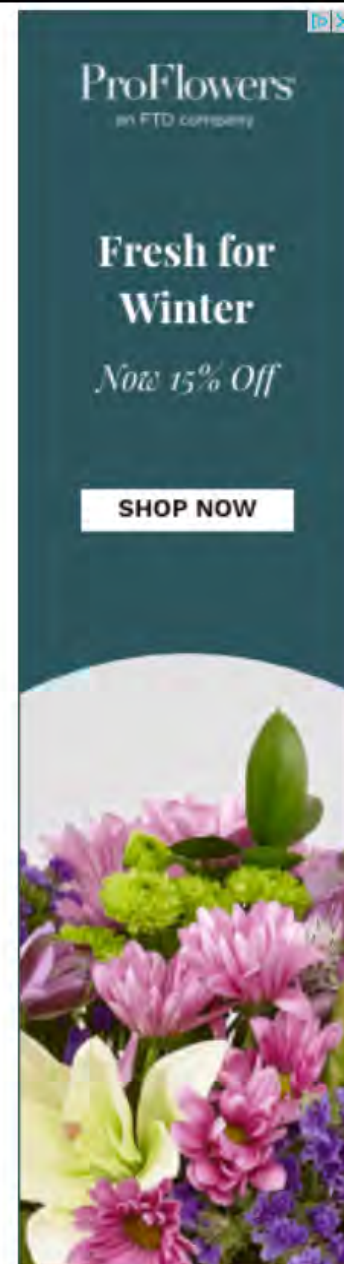
Trump: What about, what about the ballots. The shredding of the ballots. Have they been shredding ballots?

Germany: The only investigation that we have into that — they have not been shredding any ballots. There was an issue in Cobb County where they were doing normal office shredding, getting rid of old stuff, and we investigated that. But this stuff from, you know, from you know past elections.

Trump: It doesn't pass the smell test because we hear they're shredding thousands and thousands of ballots, and now what they're saying, "Oh, we're just cleaning up the office." You know.

Raffensperger: Mr. President, the problem you have with social media, they — people can say anything.

Trump: Oh this isn't social media. This is Trump media. It's not social media. It's really not; it's not social media. I don't



social media, they — people can say anything.

Trump: Oh this isn't social media. This is Trump media. It's not social media. It's really not; it's not social media. I don't care about social media. I couldn't care less. Social media is Big Tech. Big Tech is on your side, you know. I don't even know why you have a side because you should want to have an accurate election. And you're a Republican.

Raffensperger: We believe that we do have an accurate election.

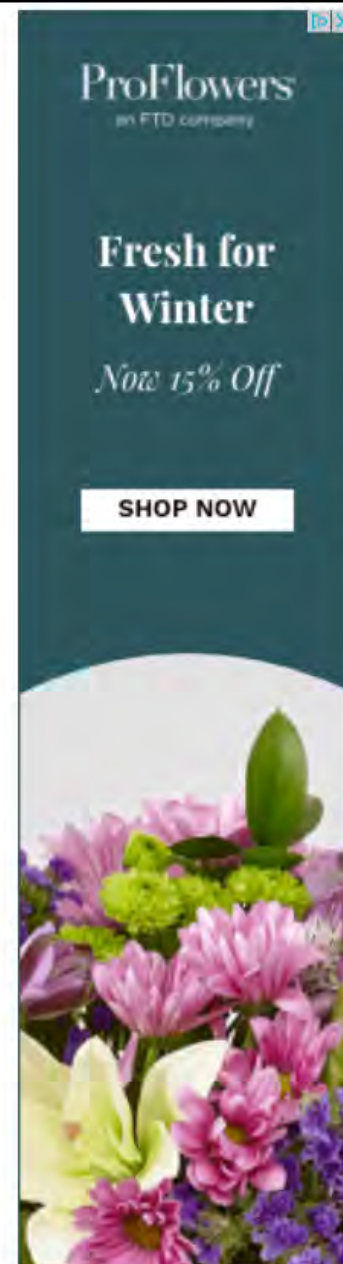
Trump: No, no you don't. No, no you don't. You don't have. Not even close. You're off by hundreds of thousands of votes. And just on the small numbers, you're off on these numbers, and these numbers can't be just — well, why won't? — Okay. So you sent us into Cobb County for signature verification, right? You sent us into Cobb County, which we didn't want to go into. And you said it would be open to the public. So we had our experts there, they weren't allowed into the room. But we didn't want Cobb County. We wanted Fulton County. And you wouldn't give it to us. Now, why aren't we doing signature — and why can't it be open to the public?

And why can't we have professionals do it instead of rank amateurs who will never find anything and don't want to find anything? They don't want to find, you know they don't want to find anything. Someday you'll tell me the reason why, because I don't understand your reasoning, but someday you'll tell me the reason why. But why don't you want to find?

Germany: Mr. President, we chose Cobb County —

Trump: Why don't you want to find . . . What?

Germany: Sorry, go ahead.



Trump: Why don't you want to find . . . What?

Germany: Sorry, go ahead.

Trump: So why did you do Cobb County? We didn't even request — we requested Fulton County, not Cobb County. Go ahead, please. Go ahead.

Germany: We chose Cobb County because that was the only county where there's been any evidence submitted that the signature verification was not properly done.

Trump: No, but I told you. We're not, we're not saying that.

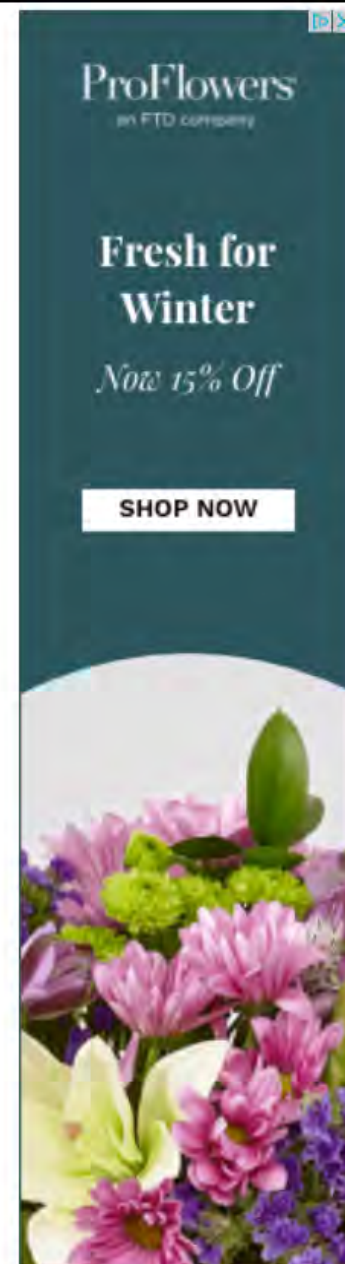
Mitchell: We did say that.

Trump: Fulton County. Look. Stacey, in my opinion, Stacey is as dishonest as they come. She has outplayed you . . . at everything. She got you to sign a totally unconstitutional agreement, which is a disastrous agreement. You can't check signatures. I can't imagine you're allowed to do harvesting, I guess, in that agreement. That agreement is a disaster for this country. But she got you somehow to sign that thing, and she has outsmarted you at every step.

And I hate to imagine what's going to happen on Monday or Tuesday, but it's very scary to people. You know, when the ballots flow in out of nowhere. It's very scary to people. That consent decree is a disaster. It's a disaster. A very good lawyer who examined it said they've never seen anything like it.

Raffensperger: Harvesting is still illegal in the state of Georgia. And that settlement agreement did not change that one iota.

Trump: It's not a settlement agreement, it's a consent



Georgia. And that settlement agreement did not change that one iota.

Trump: It's not a settlement agreement, it's a consent decree. It even says consent decree on it, doesn't it? It uses the term consent decree. It doesn't say settlement agreement. It's a consent decree. It's a disaster.

Raffensperger: It's a settlement agreement.

Trump: What's written on top of it?

Raffensperger: Ryan?

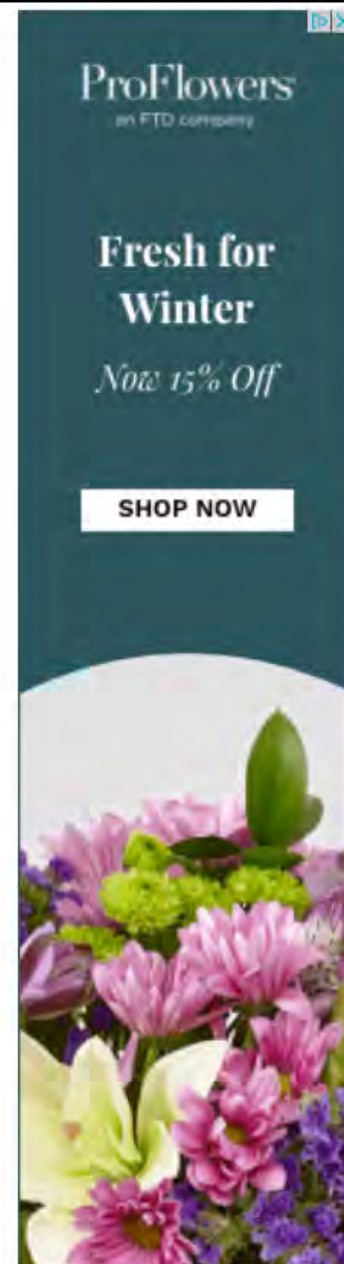
Germany: I don't have it in front of me, but it was not entered by the court, it's not a court order.

Trump: But Ryan, it's called a consent decree, is that right? On the paper. Is that right?

Germany: I don't. I don't. I don't believe so, but I don't have it in front of me.

[The Trump-Raffensperger call was big news — unless you were following conservative media]

Trump: Okay, whatever, it's a disaster. It's a disaster. Look. Here's the problem. We can go through signature verification, and we'll find hundreds of thousands of signatures, if you let us do it. And the only way you can do it, as you know, is to go to the past. But you didn't do that in Cobb County. You just looked at one page compared to another. The only way you can do a signature verification is go from the one that signed it on November whatever. Recently. And compare it to two years ago, four years ago, six years ago, you know, or even one. And you'll find that you have many different signatures. But in Fulton, where they dumped ballots, you will find that you have many that aren't





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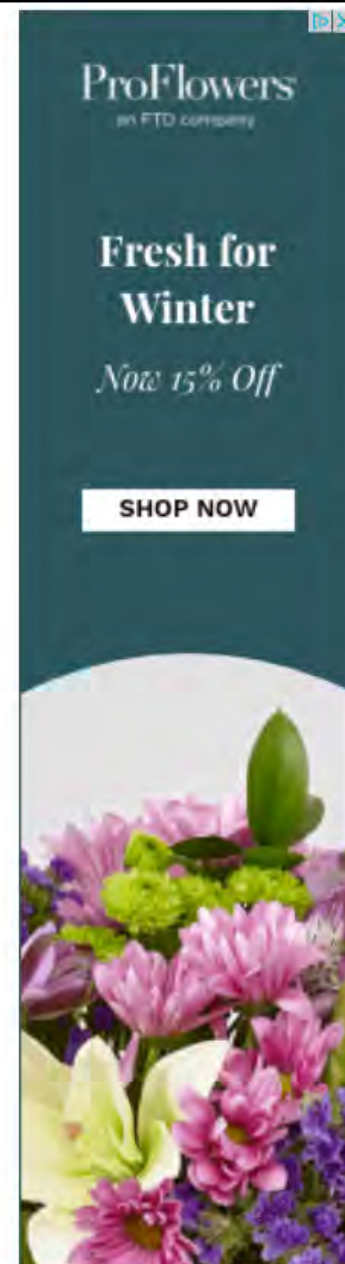
Recently. And compare it to two years ago, four years ago, six years ago, you know, or even one. And you'll find that you have many different signatures. But in Fulton, where they dumped ballots, you will find that you have many that aren't even signed and you have many that are forgeries.

Okay, you know that. You know that. You have no doubt about that. And you will find you will be at 11,779 within minutes because Fulton County is totally corrupt, and so is she totally corrupt.

And they're going around playing you and laughing at you behind your back, Brad, whether you know it or not, they're laughing at you. And you've taken a state that's a Republican state, and you've made it almost impossible for a Republican to win because of cheating, because they cheated like nobody's ever cheated before. And I don't care how long it takes me, you know, we're going to have other states coming forward — pretty good.

But I won't . . . this is never . . . this is . . . We have some incredible talent said they've never seen anything . . . Now the problem is they need more time for the big numbers. But they're very substantial numbers. But I think you're going to find that they — by the way, a little information — I think you're going to find that they are shredding ballots because they have to get rid of the ballots because the ballots are unsigned. The ballots are corrupt, and they're brand new, and they don't have seals, and there's a whole thing with the ballots. But the ballots are corrupt.

And you are going to find that they are — which is totally illegal — it is more illegal for you than it is for them because, you know, what they did and you're not reporting it. That's a criminal, that's a criminal offense. And you can't let that happen. That's a big risk to you and to Ryan, your lawyer





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illegal — it is more illegal for you than it is for them because, you know, what they did and you're not reporting it. That's a criminal, that's a criminal offense. And you can't let that happen. That's a big risk to you and to Ryan, your lawyer. And that's a big risk. But they are shredding ballots, in my opinion, based on what I've heard. And they are removing machinery, and they're moving it as fast as they can, both of which are criminal finds. And you can't let it happen, and you are letting it happen. You know, I mean, I'm notifying you that you're letting it happen. So look. All I want to do is this. I just want to find 11,780 votes, which is one more than we have because we won the state.

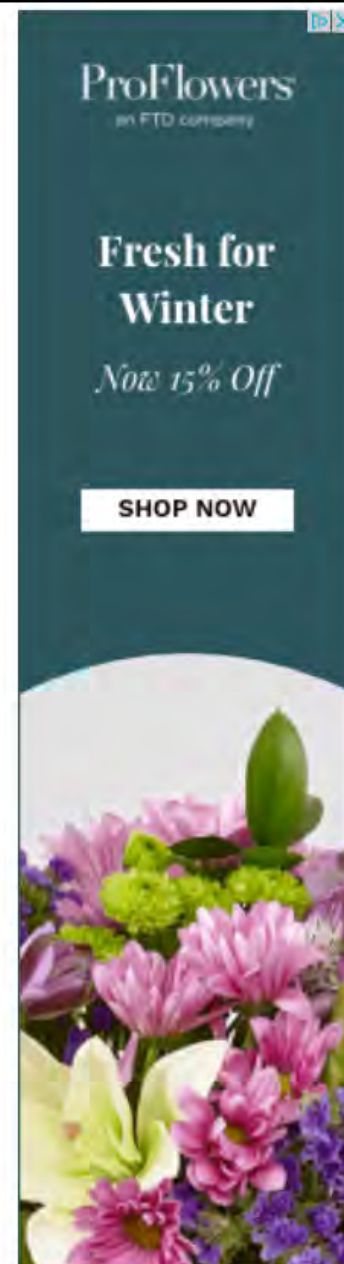
And flipping the state is a great testament to our country because, you know, this is — it's a testament that they can admit to a mistake or whatever you want to call it. If it was a mistake, I don't know. A lot of people think it wasn't a mistake. It was much more criminal than that. But it's a big problem in Georgia, and it's not a problem that's going away. I mean, you know, it's not a problem that's going away.

Germany: This is Ryan. We're looking into every one of those things that you mentioned.

Trump: Good. But if you find it, you've got to say it, Ryan.

Germany: . . . Let me tell you what we are seeing. What we're seeing is not at all what you're describing. These are investigators from our office, these are investigators from GBI, and they're looking, and they're good. And that's not what they're seeing. And we'll keep looking, at all these things.

Trump: Well, you better check on the ballots because they are shredding ballots, Ryan. I'm just telling you, Ryan. They're shredding ballots. And you should look at that very





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Trump: Well, you better check on the ballots because they are shredding ballots, Ryan. I'm just telling you, Ryan. They're shredding ballots. And you should look at that very carefully. Because that's so illegal. You know, you may not even believe it because it's so bad. But they're shredding ballots because they think we're going to eventually get there ... because we'll eventually get into Fulton. In my opinion, it's never too late. ... So, that's the story. Look, we need only 11,000 votes. We have are far more than that as it stands now. We'll have more and more. And ... do you have provisional ballots at all, Brad? Provisional ballots?

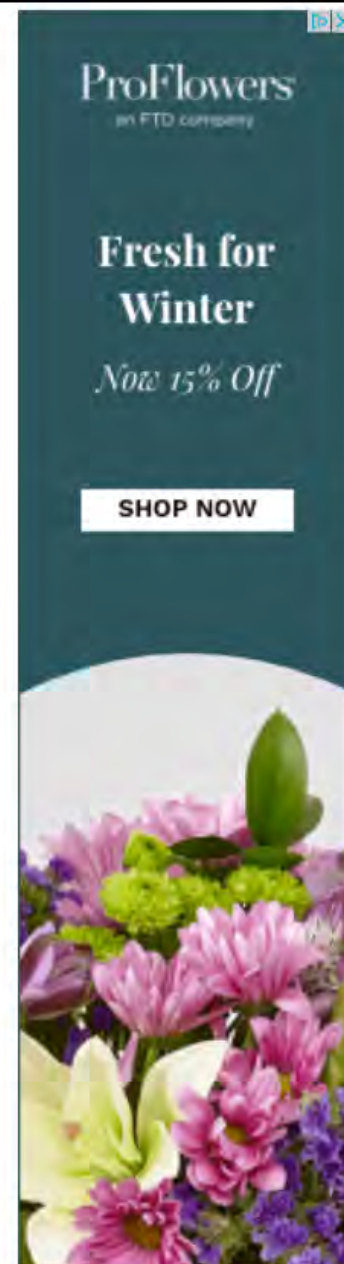
Raffensperger: Provisional ballots are allowed by state law.

Trump: Sure, but I mean, are they counted, or did you just hold them back because they, you know, in other words, how many provisional ballots do you have in the state?

Raffensperger: We'll get you that number.

Trump: Because most of them are made out to the name Trump. Because these are people that were scammed when they came in. And we have thousands of people that have testified or that want to testify. When they came in, they were proudly going to vote on November 3. And they were told, "I'm sorry, you've already been voted for, you've already voted." The women, men started screaming, "No. I proudly voted till November 3." They said, "I'm sorry, but you've already been voted for, and you have a ballot." And these people are beside themselves. So they went out, and they filled in a provisional ballot, putting the name Trump on it.

And what about that batch of military ballots that came in. And even though I won the military by a lot, it was 100 percent Trump. I mean 100 percent Biden. Do you know





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And what about that batch of military ballots that came in. And even though I won the military by a lot, it was 100 percent Trump. I mean 100 percent Biden. Do you know about that? A large group of ballots came in, I think it was to Fulton County, and they just happened to be 100 percent for Trump — for Biden — even though Trump won the military by a lot, you know, a tremendous amount. But these ballots were 100 percent for Biden. And do you know about that? A very substantial number came in, all for Biden. Does anybody know about it?

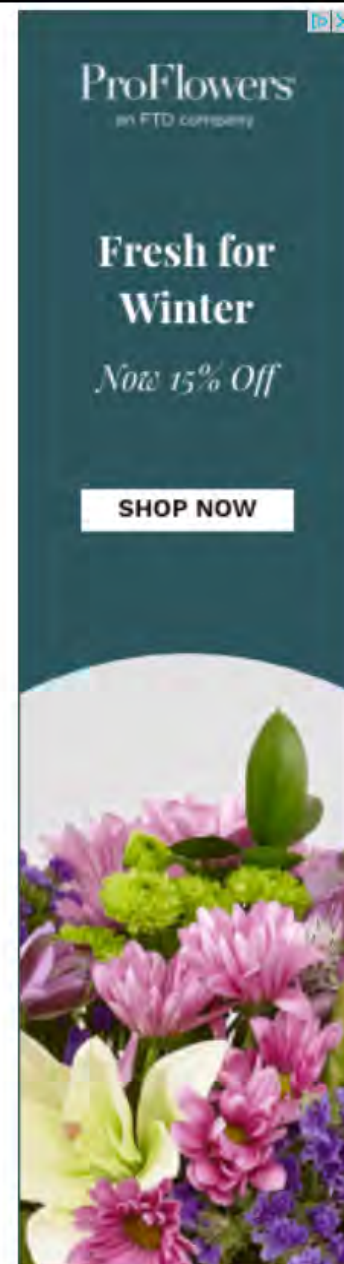
Mitchell: I know about it, but —

Trump: Okay, Cleta, I'm not asking you, Cleta, honestly. I'm asking Brad. Do you know about the military ballots that we have confirmed now. Do you know about the military ballots that came in that were 100 percent, I mean 100 percent, for Biden. Do you know about that?

Germany: I don't know about that. I do know that we have, when military ballots come in, it's not just military, it's also military and overseas citizens. The military part of that does generally go Republican. The overseas citizen part of it generally goes very Democrat. This was a mix of 'em.

Trump: No, but this was. That's okay. But I got like 78 percent of the military. These ballots were all for . . . They didn't tell me overseas. Could be overseas, too, but I get votes overseas, too, Ryan, in all fairness. No they came in, a large batch came in, and it was, quote, 100 percent for Biden. And that is criminal. You know, that's criminal. Okay. That's another criminal, that's another of the many criminal events, many criminal events here.

I don't know, look, Brad. I got to get . . . I have to find 12,000 votes, and I have them times a lot. And therefore, I won the



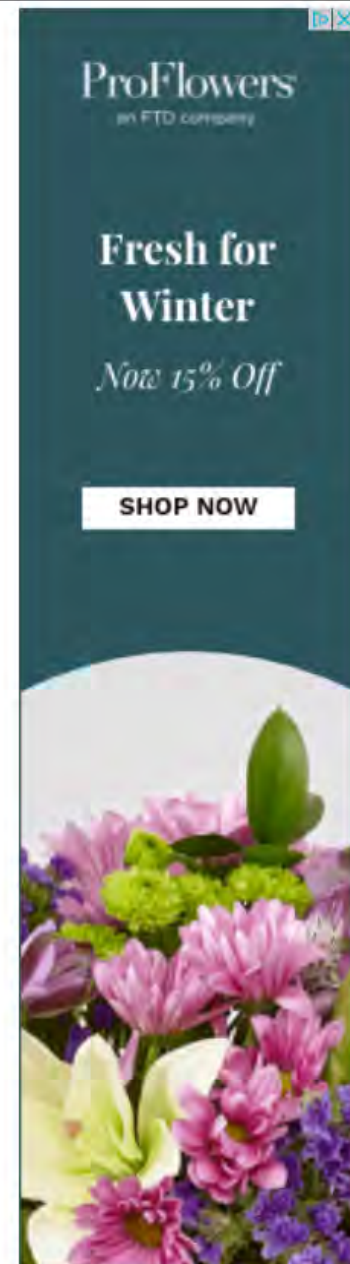
many criminal events here.

I don't know, look, Brad. I got to get . . . I have to find 12,000 votes, and I have them times a lot. And therefore, I won the state. That's before we go to the next step, which is in the process of right now. You know, and I watched you this morning, and you said, well, there was no criminality.

But I mean all of this stuff is very dangerous stuff. When you talk about no criminality, I think it's very dangerous for you to say that.

I just, I just don't know why you don't want to have the votes counted as they are. Like even you when you went and did that check. And I was surprised because, you know . . . And we found a few thousand votes that were against me. I was actually surprised because the way that check was done, all you're doing, you know, recertifying existing votes and, you know, and you were given votes and you just counted them up, and you still found 3,000 that were bad. So that was sort of surprising that it came down to three or five, I don't know. Still a lot of votes. But you have to go back to check from past years with respect to signatures. And if you check with Fulton County, you'll have hundreds of thousands because they dumped ballots into Fulton County and the other county next to it.

So what are we going to do here, folks? I only need 11,000 votes. Fellas, I need 11,000 votes. Give me a break. You know, we have that in spades already. Or we can keep it going, but that's not fair to the voters of Georgia because they're going to see what happened, and they're going to see what happened. I mean, I'll, I'll take on anybody you want with regard to [name] and her lovely daughter, a very lovely young lady, I'm sure. But, but [name] . . . I will take on anybody you want. And the minimum. there were 18.000 ballots. but they





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happened. I mean, I'll, I'll take on anybody you want with regard to [name] and her lovely daughter, a very lovely young lady, I'm sure. But, but [name] . . . I will take on anybody you want. And the minimum, there were 18,000 ballots, but they used them three times. So that's, you know, a lot of votes. And they were all to Biden, by the way, that's the other thing we didn't say. You know, [name], the one thing I forgot to say, which was the most important. You know that every single ballot she did went to Biden. You know that, right? Do you know that, by the way, Brad?

Every single ballot that she did through the machines at early, early in the morning went to Biden. Did you know that, Ryan?

Germany: That's not accurate, Mr. President.

Trump: Huh. What is accurate?

Germany: The numbers that we are showing are accurate.

Trump: No, about [name]. About early in the morning, Ryan. Where the woman took, you know, when the whole gang took the stuff from under the table, right? Do you know, do you know who those ballots, do you know who they were made out to, do you know who they were voting for?

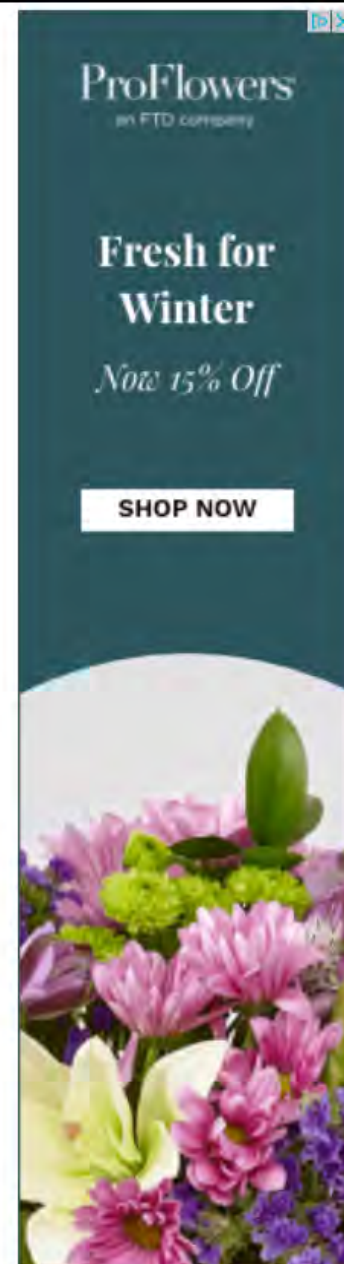
Germany: No, not specifically.

Trump: Did you ever check?

Germany: We did what I described to you earlier —

Trump: No no no — did you ever check the ballots that were scanned by [name], a known political operative, balloteer? Did ever check who those votes were for?

Germanv: We looked into that situation that you described.





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scanned by [name] , a known political operative, balloteer?

Did ever check who those votes were for?

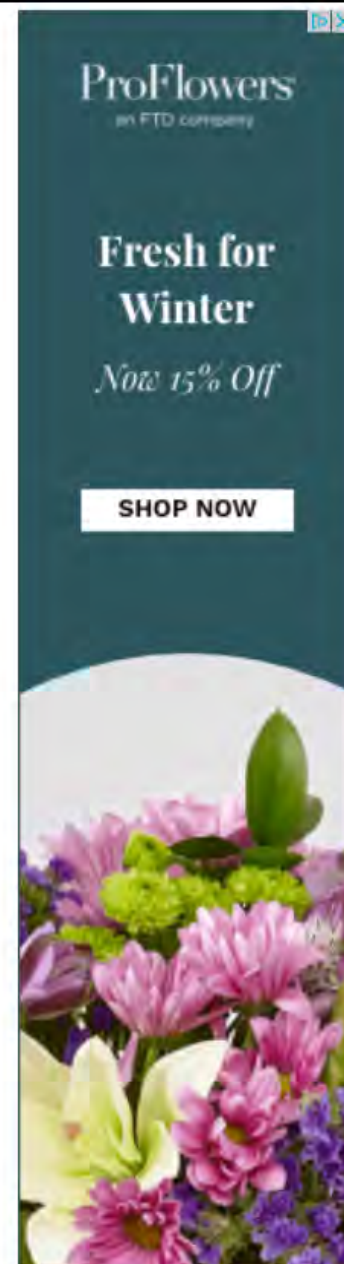
Germany: We looked into that situation that you described.

Trump: No, they were 100 percent for Biden. 100 percent. There wasn't a Trump vote in the whole group. Why don't you want to find this, Ryan? What's wrong with you? I heard your lawyer is very difficult, actually, but I'm sure you're a good lawyer. You have a nice last name.

But, but I'm just curious, why wouldn't, why do you keep fighting this thing? It just doesn't make sense. We're way over the 17,779, right? We're way over that number, and just if you took just [name] , we're over that number by five, five or six times when you multiply that times three.

And every single ballot went to Biden, and you didn't know that, but now you know it. So tell me, Brad, what are we going to do? We won the election, and it's not fair to take it away from us like this. And it's going to be very costly in many ways. And I think you have to say that you're going to reexamine it, and you can reexamine it, but reexamine it with people that want to find answers, not people that don't want to find answers. For instance, I'm hearing Ryan that he's probably, I'm sure a great lawyer and everything, but he's making statements about those ballots that he doesn't know. But he's making them with such — he did make them with surety. But now I think he's less sure because the answer is, they all went to Biden, and that alone wins us the election by a lot. You know, so.

Raffensperger: Mr. President, you have people that submit information, and we have our people that submit information. And then it comes before the court, and the court then has to make a determination. We have to stand by

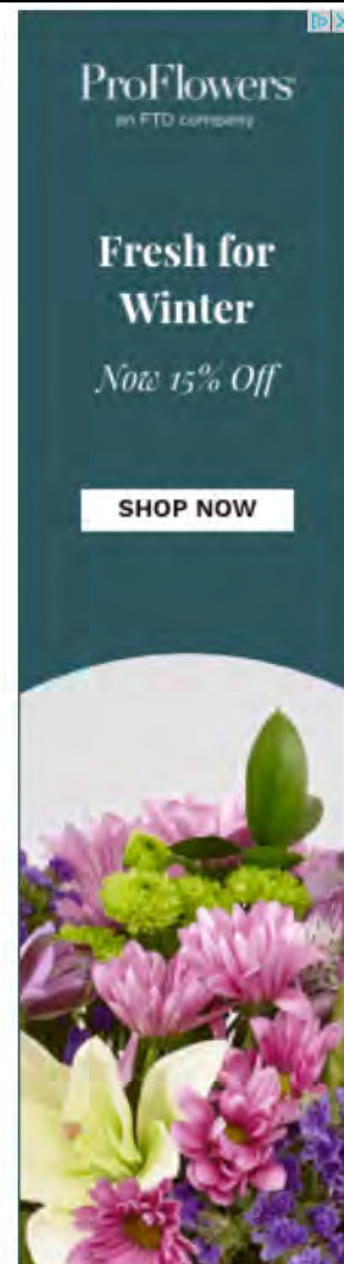


Raffensperger: Mr. President, you have people that submit information, and we have our people that submit information. And then it comes before the court, and the court then has to make a determination. We have to stand by our numbers. We believe our numbers are right.

Trump: Why do you say that, though? I don't know. I mean, sure, we can play this game with the courts, but why do you say that? First of all, they don't even assign us a judge. They don't even assign us a judge. But why wouldn't you . . . Hey Brad, why wouldn't you want to check out [name]? And why wouldn't you want to say, hey, if in fact, President Trump is right about that, then he wins the state of Georgia, just that one incident alone without going through hundreds of thousands of dropped ballots. You just say, you stick by, I mean I've been watching you, you know, you don't care about anything. "Your numbers are right." But your numbers aren't right. They're really wrong, and they're really wrong, Brad. And I know this phone call is going nowhere other than, other than ultimately, you know — Look, ultimately, I win, okay? Because you guys are so wrong. And you treated this. You treated the population of Georgia so badly. You, between you and your governor, who is down at 21, he was down 21 points. And like a schmuck, I endorsed him, and he got elected, but I will tell you, he is a disaster.

The people are so angry in Georgia, I can't imagine he's ever getting elected again, I'll tell you that much right now. But why wouldn't you want to find the right answer, Brad, instead of keep saying that the numbers are right? 'Cause those numbers are so wrong?

Mitchell: Mr. Secretary, Mr. President, one of the things that we have been, Alex can talk about this, we talked about it, and I don't know whether the information has been conveyed to your office, but I think what the president is





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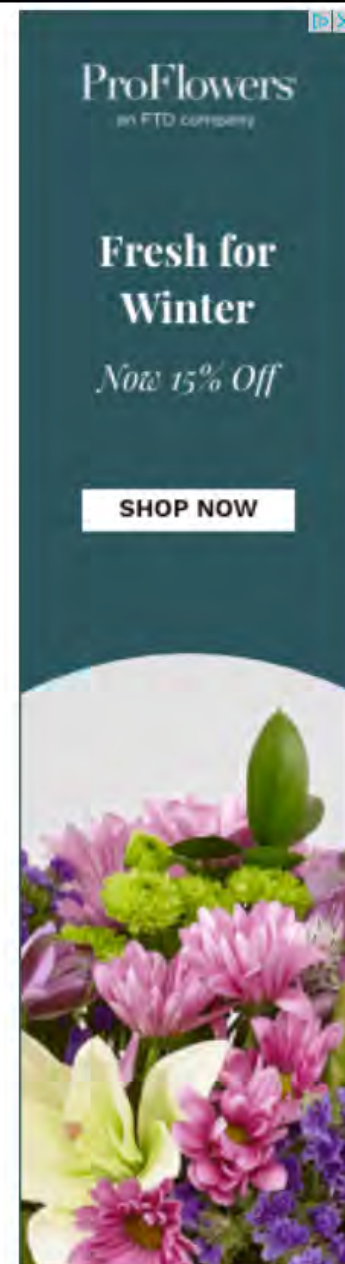


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Mitchell: Mr. Secretary, Mr. President, one of the things that we have been, Alex can talk about this, we talked about it, and I don't know whether the information has been conveyed to your office, but I think what the president is saying, and what we've been trying to do is to say, look, the court is not acting on our petition. They haven't even assigned a judge. But the people of Georgia and the people of America have a right to know the answers. And you have data and records that we don't have access to.

And you can keep telling us and making public statement that you investigated this and nothing to see here. But we don't know about that. All we know is what you tell us. What I don't understand is why wouldn't it be in everyone's best interest to try to get to the bottom, compare the numbers, you know, if you say, because . . . to try to be able to get to the truth because we don't have any way of confirming what you're telling us. You tell us that you had an investigation at the State Farm Arena. I don't have any report. I've never seen a report of investigation. I don't know that is. I've been pretty involved in this, and I don't know. And that's just one of 25 categories. And it doesn't even. And as I, as the president said, we haven't even gotten into the Dominion issue. That's not part of our case. It's not part of, we just didn't feel as though we had any to be able to develop —

Trump: No, we do have a way, but I don't want to get into it. We found a way . . . excuse me, but we don't need it because we're only down 11,000 votes, so we don't even need it. I personally think they're corrupt as hell. But we don't need that. All we have to do, Cleta, is find 11,000-plus votes. So we don't need that. I'm not looking to shake up the whole world. We won Georgia easily. We won it by hundreds of thousands of votes. But if you go by basic, simple numbers, we won it easily, easily. So we're not giving Dominion a pass on the





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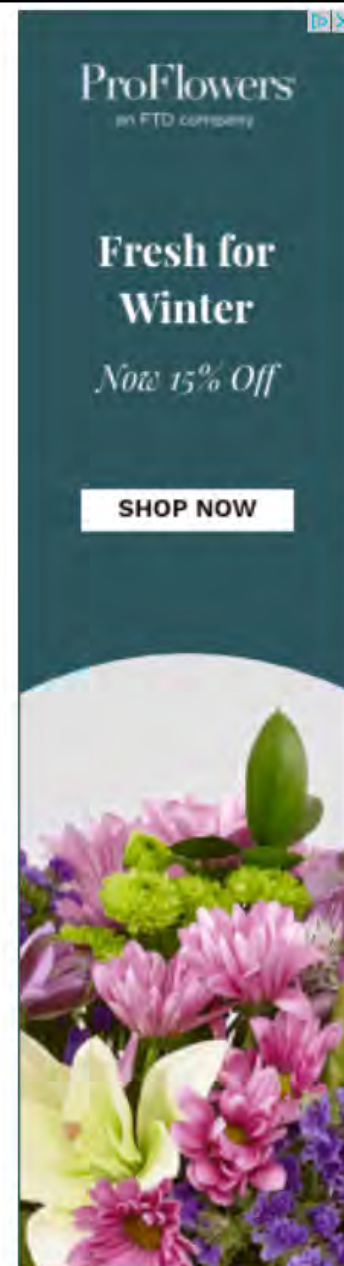
We won Georgia easily. We won it by hundreds of thousands of votes. But if you go by basic, simple numbers, we won it easily, easily. So we're not giving Dominion a pass on the record. We don't need Dominion because we have so many other votes that we don't need to prove it any more than we already have.

Hilbert: Mr. President and Cleta, this is Kurt Hilbert, if I might interject for a moment. Ryan, I would like to suggest that just four categories that have already been mentioned by the president that have actually had numbers of 24,149 votes that were counted illegally. That in and of itself is sufficient to change the results or place the outcome in doubt. We would like to sit down with your office, and we can do it through purposes of compromise and just like this phone call, just to deal with that limited category of votes. And if you are able to establish that our numbers are not accurate, then fine. However, we believe that they are accurate. We've had now three to four separate experts looking at these numbers.

Trump: Certified accountants looked at them.

Hilbert: Correct. And this is just based on USPS data and your own secretary of state data. So that's what we would entreat and ask you to do, to sit down with us in a compromise and settlements proceeding and actually go through the registered voter IDs and the registrations. And if you can convince us that 24,149 is inaccurate, then fine. But we tend to believe that is, you know, obviously more than 11,779. That's sufficient to change the results entirely in and of itself. So what would you say to that, Mr. Germany?

Germany: I'm happy to get with our lawyers, and we'll set that up. That number is not accurate. And I think we can show you, for all the ones we've looked at, why it's not. And





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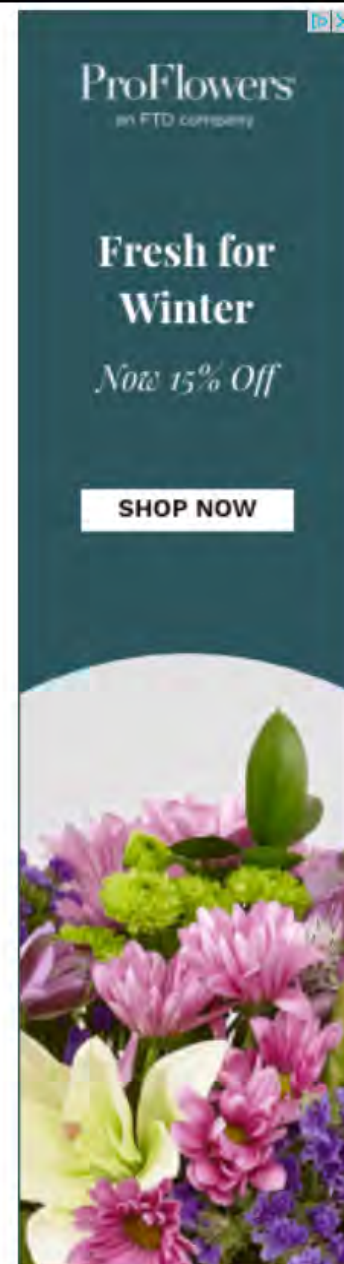
Germany: I'm happy to get with our lawyers, and we'll set that up. That number is not accurate. And I think we can show you, for all the ones we've looked at, why it's not. And so if that would be helpful, I'm happy to get with our lawyers and set that up with you guys.

Trump: Well, let me ask you, Kurt, you think that is an accurate number. That was based on the information given to you by the secretary of state's department, right?

Hilbert: That is correct. That information is the minimum, most conservative data based upon the USPS data and the secretary of state's office data that has been made publicly available. We do not have the internal numbers from the secretary of state. Yet we have asked for it six times. I sent a letter over to . . . several times requesting this information, and it's been rebuffed every single time. So it stands to reason that if the information is not forthcoming, there's something to hide. That's the problem that we have.

Germany: Well, that's not the case, sir. There are things that you guys are entitled to get. And there's things that under law, we are not allowed to give out.

Trump: Well, you have to. Well, under law, you're not allowed to give faulty election results, okay? You're not allowed to do that. And that's what you done. This is a faulty election result. And honestly, this should go very fast. You should meet tomorrow because you have a big election coming up, and because of what you've done to the president — you know, the people of Georgia know that this was a scam — and because of what you've done to the president, a lot of people aren't going out to vote. And a lot of Republicans are going to vote negative because they hate what you did to the president. Okay? They hate it. And they're going to vote. And





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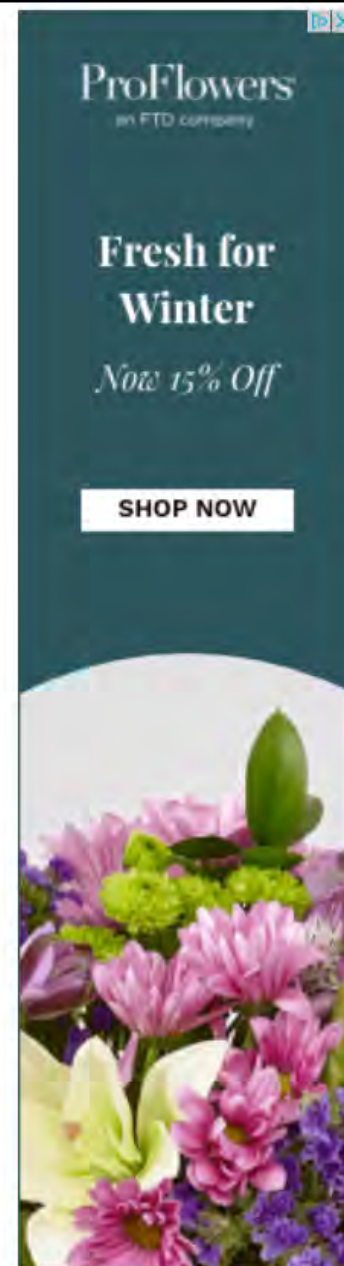
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people aren't going out to vote. And a lot of Republicans are going to vote negative because they hate what you did to the president. Okay? They hate it. And they're going to vote. And you would be respected. Really respected, if this thing could be straightened out before the election. You have a big election coming up on Tuesday. And I think that it is really is important that you meet tomorrow and work out on these numbers. Because I know, Brad, that if you think we're right, I think you're going to say, and I'm not looking to blame anybody, I'm just saying, you know, and, you know, under new counts, and under new views, of the election results, we won the election. You know? It's very simple. We won the election. As the governors of major states and the surrounding states said, there is no way you lost Georgia. As the Georgia politicians say, there is no way you lost Georgia. Nobody. Everyone knows I won it by hundreds of thousands of votes. But I'll tell you it's going to have a big impact on Tuesday if you guys don't get this thing straightened out fast.

Meadows: Mr. President, this is Mark. It sounds like we've got two different sides agreeing that we can look at those areas, and I assume that we can do that within the next 24 to 48 hours, to go ahead and get that reconciled so that we can look at the two claims and making sure that we get the access to the secretary of state's data to either validate or invalidate the claims that have been made. Is that correct?

Germany: No, that's not what I said. I'm happy to have our lawyers sit down with Kurt and the lawyers on that side and explain to him, hey, here's, based on what we've looked at so far, here's how we know this is wrong, this is wrong, this is wrong, this is wrong, this is wrong.

Meadows: So what you're saying, Ryan, let me let me make sure . . . so what you're saying is you really don't want to give



wrong, this is wrong, this is wrong.

Meadows: So what you're saying, Ryan, let me let me make sure . . . so what you're saying is you really don't want to give access to the data. You just want to make another case on why the lawsuit is wrong?

Germany: I don't think we can give access to data that's protected by law. But we can sit down with them and say —

Trump: But you're allowed to have a phony election? You're allowed to have a phony election, right?

Germany: No, sir.

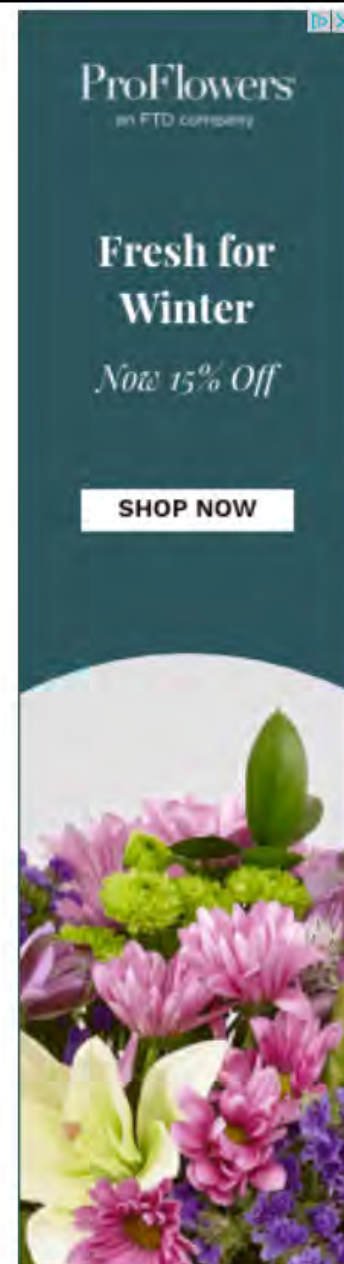
Trump: When are you going to do signature counts, when are you going to do signature verification on Fulton County, which you said you were going to do, and now all of a sudden, you're not doing it. When are you doing that?

Germany: We are going to do that. We've announced —

Hilbert: To get to this issue of the personal information and privacy issue, is it possible that the secretary of state could deputize the lawyers for the president so that we could access that information and private information without you having any kind of violation?

Trump: Well, I don't want to know who it is. You guys can do it very confidentially. You can sign a confidentiality agreement. That's okay. I don't need to know names. But on this stuff that we're talking about, we got all that information from the secretary of state.

Meadows: Yeah. So let me let me recommend, Ryan, if you and Kurt will get together, you know, when we get off of this phone call, if you could get together and work out a plan to address some of what we've got with your attorneys where we



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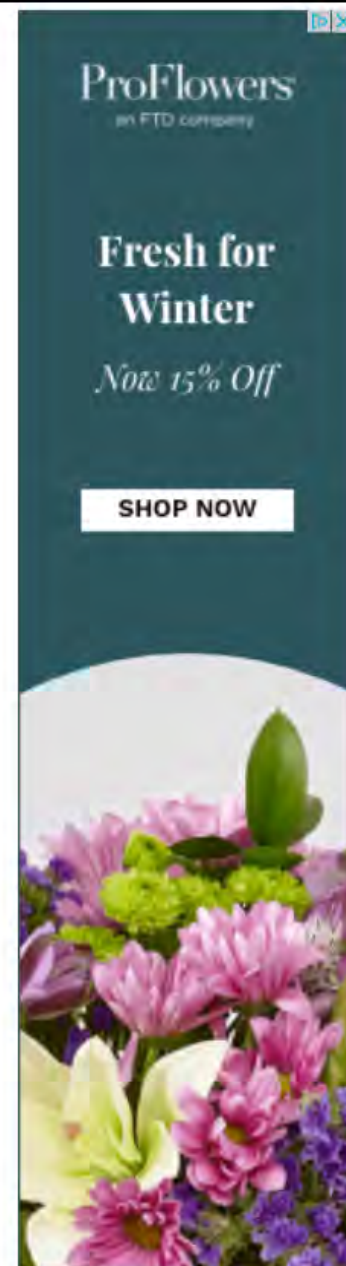
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Meadows: Yeah. So let me let me recommend, Ryan, if you and Kurt will get together, you know, when we get off of this phone call, if you could get together and work out a plan to address some of what we've got with your attorneys where we can we can actually look at the data. For example, Mr. Secretary, I can you say they were only two dead people who would vote. I can promise you there are more than that. And that may be what your investigation shows, but I can promise you there are more than that. But at the same time, I think it's important that we go ahead and move expeditiously to try to do this and resolve it as quickly as we possibly can. And if that's the good next step. Hopefully we can, we can finish this phone call and go ahead and agree that the two of you will get together immediately.

Trump: Well, why don't my lawyers show you where you got the information. It will show the secretary of state, and you don't even have to look at any names. We don't want names. We don't care. But we got that information from you. And Stacey Abrams is laughing about you. She's going around saying these guys are dumber than a rock. What she's done to this party is unbelievable, I tell you. And I only ran against her once. And that was with a guy named Brian Kemp, and I beat her. And if I didn't run, Brian wouldn't have had even a shot, either in the general or in the primary. He was dead, dead as a doornail. He never thought he had a shot at either one of them. What a schmuck I was. But that's the way it is. That's the way it is. I would like you . . . for the attorneys . . . I'd like you to perhaps meet with Ryan, ideally tomorrow, because I think we should come to a resolution of this before the election. Otherwise you're going to have people just not voting. They don't want to vote. They hate the state, they hate the governor, and they hate the secretary of state. I will tell you that right now. The only people that like you are people that will never vote for you. You know that Brad right? They





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voting. They don't want to vote. They hate the state, they hate the governor, and they hate the secretary of state. I will tell you that right now. The only people that like you are people that will never vote for you. You know that, Brad, right? They like you, you know, they like you. They can't believe what they found. They want more people like you. So, look, can you get together tomorrow? And, Brad, we just want the truth. It's simple.

And everyone's going to look very good if the truth comes out. It's okay. It takes a little while, but let the truth come out. And the real truth is, I won by 400,000 votes. At least. That's the real truth. But we don't need 400,000 votes. We need less than 2,000 votes. And are you guys able to meet tomorrow, Ryan?

Germany: I'll get with Chris, the lawyer who's representing us in the case, and see when he can get together with Kurt.

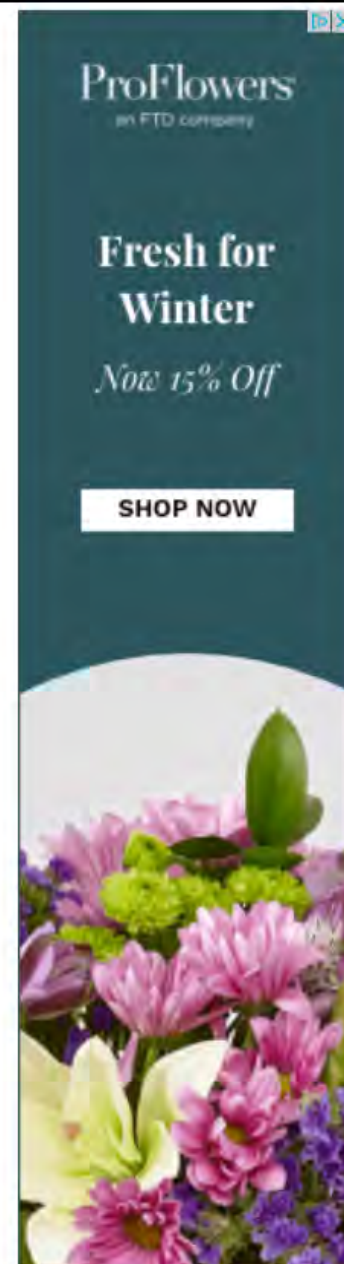
Raffensperger: Ryan will be in touch with the other attorney on this call, Mr. Meadows. Thank you, President Trump, for your time.

Trump: Okay, thank you, Brad. Thank you, Ryan. Thank you. Thank you, everybody. Thank you very much. Bye.

An earlier version of the full audio of Trump's call inadvertently left in a reference to an individual about whom he has made unsubstantiated claims. It has since been updated.

Complete coverage: The Trump-Raffensperger call

Updated January 5, 2021



Complete coverage: The Trump-Raffensperger call

Updated January 5,
2021

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Amy Gardner

Amy Gardner joined The Washington Post in 2005. She has worked stints in the Virginia suburbs, covered the 2010 midterms and the tea party revolution, and covered the Republican presidential nominating contest in 2011-2012. She was a politics editor for five years and returned to reporting in 2018. Follow [🐦](#)

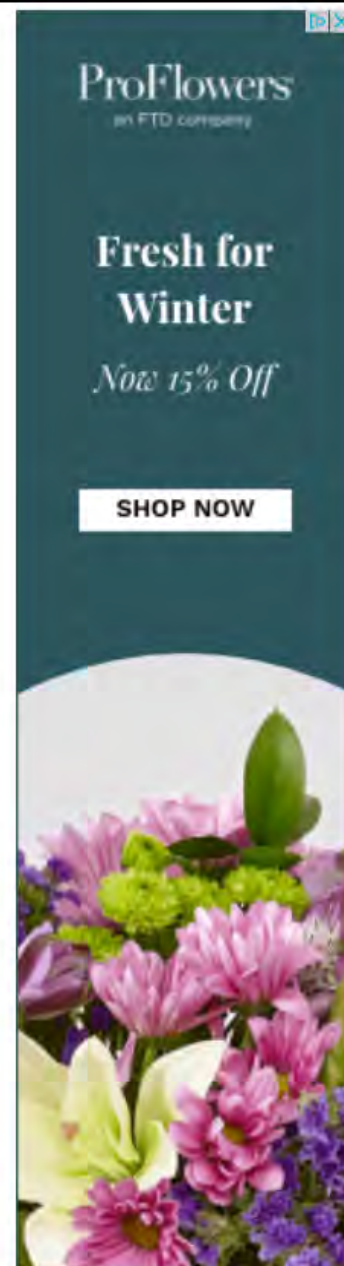
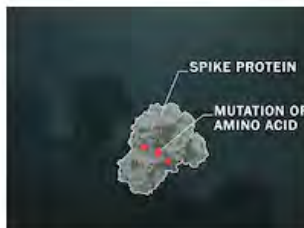


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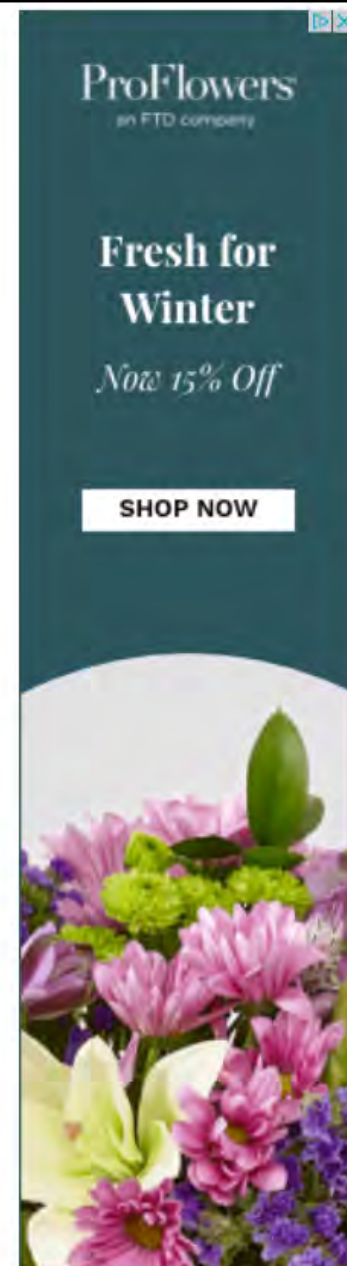


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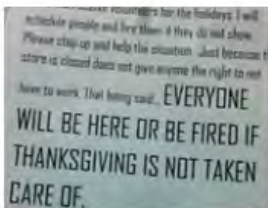
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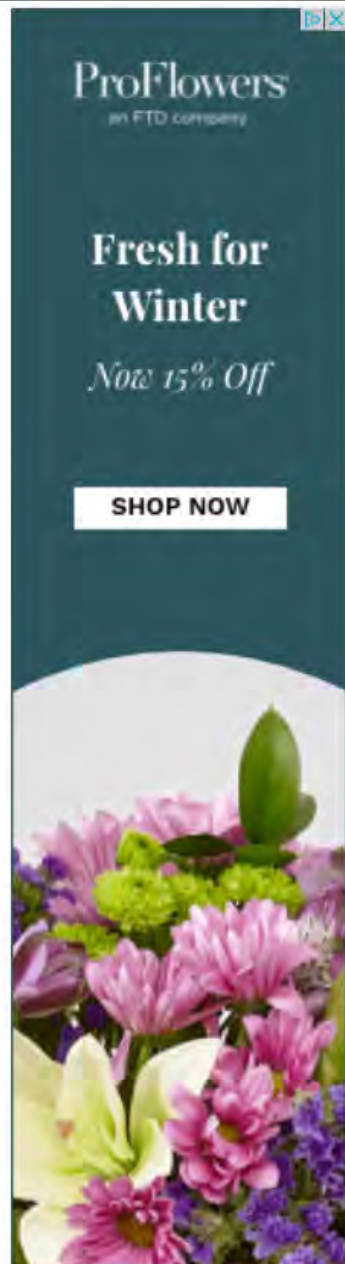
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**Dan Sizemore** 2 minutes ago

Raffensperger: Mr. President, the problem you have with social media, they — people can say anything.

Trump: Oh this isn't social media. This is Trump media.

Me: LOL

Like Reply Link Report

**WonderfulWorld** 5 minutes ago

Respect to Raffensberg and Germany for never screaming 'Oh, jeez, just shut up!'

My brain hurts from reading Trump's baffling BS...having to listen to it delivered in that 'glue pouring from a keg' voice would send me round the twist.

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**Bluewaterdream** 5 minutes ago (Edited)

The real story is here:

You don't need much of a number because the number that in theory I lost by, the margin would be 11,779. But you also have a substantial numbers of people, thousands and thousands, who went to the voting place on November 3, were told they couldn't vote, were told they couldn't vote because a ballot had been put on their name. And you know that's very, very, very, very sad. We had, I believe it's about 4,502 voters who voted but who weren't on the voter registration list, so it's 4,502 who voted, but they weren't on the voter registration roll, which they had to be. You

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Exhibit 14

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File:
PBS NewsHour
WATCH: Georgia election officials reject Trump call to
'find' more votes

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1 GABRIEL STERLING: So as of right now, we
2 have 962,886 mail-in absentee ballots received.
3 There's 281,376 that are still outstanding.

4 I'm hoping to get the military received and
5 outstanding before the end of this press
6 conference, which will hopefully come in on my
7 cell phone.

8 Early vote in person -- obviously, we
9 smashed a record for turnout on that one. We're
10 at 2,074,857. So that means right now we're
11 looking at 3,027,743 votes that have already been
12 cast across Georgia.

13 Now, the previous record for a runoff
14 election was in 2004 -- I think that's right --
15 Saxby Chambliss race, which was 2.1 million votes
16 that were cast. That is the previous record. And
17 in the election 2018, the runoff election, we saw
18 just under 1.5 million.

19 So, obviously, a lot of interest. I'm sure
20 Georgians are tired of TV ads, text messages,
21 voicemails, and mail; so it's all going to end
22 very soon, hopefully.

23 In preparation for the election tomorrow,
24 on Election Day voting, we have 6,963 poll pads.
25 They finished the final loading of -- of their

1 data today before lunch. We had about 21
2 counties, which are the last ones to go, most of
3 them completed over the weekend.

4 There will be a total of 6,009- -- oh,
5 sorry -- 2,648 polling locations open on Election
6 Day. We have a couple of them closed due to some
7 shortages, and some other Covid-related items; but
8 the total we have right now is 2,648. We don't
9 anticipate changes, but that always may happen.

10 We have shared those locations with Georgia
11 Power and the EMCs in case there's power issues or
12 any other issues that might come up from that.
13 And we've seen a few shortages of poll workers; so
14 -- I think specifically we saw Morgan County,
15 they're going to lose two locations because of
16 that.

17 Now, what we've seen also is a difference
18 in the turnout models depending on congressional
19 district and county in the state, so far in large
20 part driven by the continuing misinformation and
21 disinformation concerning the value of people's
22 votes in this state.

23 The Secretary wants me to make clear that
24 everybody's vote is going to count. Everybody's
25 vote did count. I want to make that abundantly

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1 clear.

2 If you care about, you know, the values and
3 direction of the nation you want to see, it is
4 your obligation to turn out and vote tomorrow, be
5 you Democrat or Republican. However, right now
6 given the nature of the President's statements and
7 several other people who have been aligned with
8 him previously, who literally had a rally saying
9 protest and don't vote, we are specifically asking
10 you and telling you, please turn out and vote
11 tomorrow.

12 One of the things, specifically, I've had
13 to argue with people whom I've known for 20 years,
14 they say: Well, we feel like our election was
15 stolen; we feel like our votes don't count.

16 And I said: Okay, I'm not acknowledging
17 the election stolen, because it wasn't. I'm not
18 acknowledging that there was massive voter fraud,
19 because there wasn't.

20 I said: But if you believe in your heart
21 of hearts that there was, the best thing for you
22 to do is to turn out and vote and make it harder
23 for them to steal. If that's what you genuinely
24 in your heart of hearts believe, turn out and
25 vote.

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1 There are people who fought and died and
2 marched and prayed and voted to get the right to
3 vote. Throwing it away because you have some
4 feeling that it may not matter is self-destructive
5 ultimately, and a self-fulfilling prophecy in the
6 end.

7 So everybody who cares about the future of
8 this nation should turn out and vote (inaudible)
9 it's vitally important. It's absolutely
10 important. And the reason I'm having to stand
11 here today is because there are people in
12 positions of authority and respect who have said
13 their votes didn't count, and it's not true.

14 And I'm going to do it again, and I'm going
15 to go through all this anti-disinformation Monday
16 -- it's -- it's whack-a-mole again. It is
17 Groundhog Hay again. I'm going to get to talk
18 about things that I've talked about repeatedly for
19 two months, but I'm going to do it again one last
20 time, I'm hoping.

21 Because at the end of the day we want to
22 make sure people understand their votes count,
23 every person, every voice matters. And I know
24 that there's people who fought for that for years
25 about this.

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1 So let's -- let's start again. And, yes,
2 some of this is going to come out of the
3 continuing statements from the President, and some
4 of his supporters. State fund. All right. This
5 has been one that's been conflated over several
6 different things. We have multiple scan ballots,
7 we have Ruby Freeman, we have the leak, but it
8 says water main break, which wasn't a water main
9 break.

10 So in order to be fully transparent -- I
11 mean, one of the things we did we -- we had a
12 local media organization (inaudible) Just- --
13 Justin over here, we went through it for hours and
14 hours, we walked through frame by frame and showed
15 what happened.

16 So let's start: If you go to
17 securevotega.com, we have posted all the videos
18 from State Farm for that day to cover the relevant
19 periods. 5:23 a.m., the -- they walk in, and they
20 discover what is essentially a pond on the floor,
21 where you can see water coming out of the sky.

22 So they say: Okay, we can't do our work
23 here this morning. They call in the State Farm
24 people -- it's not Fulton County people, which is
25 one of the other things they said, there's no

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1 Fulton County work order to fix the water leak.
2 And guess what? It wasn't in a Fulton County
3 facility, it was the State Farm. So they were the
4 ones who fixed the leak, and it was a urinal that
5 had overflowed, because they were turned off
6 because -- guess what, nobody's in State Farm
7 because of Covid, other than this particular
8 usage.

9 So they turned off all those things and it
10 went over the edge of the relief valve, and that's
11 what caused the leak. So they come in. Then you
12 go to another one about 7:00 in the morning or so,
13 where you have essentially the -- I don't know
14 what to call it -- the drying Zamboni, is driving
15 around on the carpet, cleaning it all up. Then at
16 about 7:00 -- or 8:23, you see a woman bringing in
17 the table in question that has been the point of
18 Mr. Giuliani's 90-second clip. She's pulling it
19 with one hand, and she sets it down. There's
20 nothing underneath it. Okay?

21 Then you can fast forward to later in the
22 day, about 9:45 or so; everybody there -- there
23 were two groups of people there. There's cutters
24 and there are scanners. What happened was, the
25 cutters began putting their stuff away because

1 everybody's under the impression they were going
2 to get home. We have discovered this. So they
3 start putting covers over the cutting machines,
4 and everything.

5 So then we see also while the monitors in
6 the press are still in the room, they bring out
7 the carriers which are normal absentee ballot
8 carriers. And I will admit, when I listened to
9 the audio of the phone call and the President
10 brought that up again and I heard it on a radio ad
11 again today, I wanted to scream -- well, I did
12 scream at the computer, and I screamed in my car
13 at the radio talking about this, because this has
14 been thoroughly debunked.

15 They bring out the normal absentee ballot
16 carriers, there are monitors in the room. There
17 is press in the room. They take the ballots that
18 have been opened, put them in carrier trays, and
19 put them in there and then -- put them in the
20 boxes, put the lid onto -- the lid matches the
21 box, and then you see at one point during the
22 video a woman crawling on the floor putting the
23 numbered seals on him so they can keep the chain
24 of custody.

25 Approximately, 10:25-10:30, the Secretary

1 in our office receives word that Fulton County is
2 shutting down for the night at -- at State Farm
3 arena. So as some of y'all who were there on
4 Election might recall the Secretary got a little
5 irritated with this and made his feelings quite
6 known. He said: Some of us will be working
7 through the night, we're glad to see that Fulton
8 County sees the need to just go ahead and knock
9 off for the evening.

10 So Chris Harvey, our elections director,
11 then calls Rick Barron, the elections director for
12 Fulton County, who was at the other location,
13 which was their English Street Warehouse, because
14 he was doing Election Day activities. Chris calls
15 Rick.

16 Rick says: We're not shutting down. Well,
17 Chris says: It looks like you are.

18 So then you can go back to the videotape
19 and see Ralph Jones take a phone call at,
20 approximately -- almost 11 o'clock. And you can
21 see his shoulders kind of shrug. He takes the
22 phone call; he's being told at that point by his
23 boss Rick Barron: You need to stay and continue
24 to scam.

25 So he hangs up the phone. He goes over to

1 them boxes, put some more seals on them, because
2 obviously -- if you watch the videotape, many of
3 the people that are there have been there since
4 7:00 in the morning. It's already 11 o'clock at
5 night. They were all under the impression they
6 were going to get to go home.

7 So you see him spend about 30 seconds
8 going: Heck, what am I going to say to these
9 people? So he walks back over to the corner of a
10 desk and says: I got the word, we got to keep on
11 scanning.

12 So they go back to the boxes that they --
13 you see them put under the table at the --
14 approximately, ten o'clock hour. There is
15 videotape of this.

16 And this is what's really frustrating, the
17 President's legal team had the entire tape, they
18 watched the entire tape, and then from our point
19 of view, intentionally misled the State Senate,
20 the voters, and the people United States about
21 this.

22 It was intentional. It was obvious. And
23 anybody watching this knows that. Anyone watching
24 it knows that. That's why we released the entire
25 tape for people to watch.

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1 So there's this claim that that was done.
2 So they pull those out and begin to scan. Then
3 the other claim comes about a woman named Ruby
4 Freeman and multiple scanning. One of the things
5 you need to understand is a normal ballot
6 processing -- if there is a problem with a ballot,
7 what it does is it stops, but before that four or
8 five will get through; so they say: Delete that
9 last batch, and rescan it so they scan properly.
10 That is the normal process that is done.

11 Secondarily to that, everybody might be
12 familiar with the fact the President wanted us to
13 do a hand recount, a hand re-tally, which we ended
14 up doing under our audit. That audit showed that
15 there was no problem with machine scanning. If
16 somebody took a stack of ballots and scanned them
17 multiple times, you would have a lot of votes with
18 no corresponding ballots.

19 So let's go over the numbers one more time:
20 Statewide it was a -- for the (inaudible) number
21 of ballots they were off by .1053 percent. For
22 the margin they were off by .0099 percent. Which
23 shows that the machine scanned properly, our
24 counties did a great job of following these
25 batches, and doing the hand count properly,

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1 appropriately, with scrutiny and with observers.

2 So let's put that to bed right now.

3 And one of the other things we -- we did as
4 part of our transparency is, we have put all of
5 those tally sheets online for every county so you
6 can go through and look at them all. And it's at,
7 again, the securevotega.com.

8 Let's see -- let's go over the numbers the
9 President's team is claiming. We have a little
10 chart over here. They're claiming there were
11 2,056 felons that voted. Our research -- and we
12 have better data because we're directly tied to
13 the state government on this, by the Department of
14 Corrections, and -- the -- the other department --
15 which I can't know recall what it's called right
16 now -- basically attracts when people are on
17 probation -- there we go.

18 We know exactly how many people voted for
19 this, because we have an outward bound of 74
20 potential people who are felons voted. What that
21 means is, that's the biggest number it could be.
22 We will investigate and find out if some of these
23 people completed their sentences, some of these
24 people have the same name and birth date; so
25 there'll be some crossover there. So 74 is the

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1 outward bound, it's going to be lower than that.

2 So let's be clear about that.

3 Then there's the claim that 66,248 people
4 below the age of 18 voted. The actual number is
5 zero. Let me be clear: 66,000 versus zero. And
6 the reason we know that is because the dates are
7 on the voter registration. There are four cases
8 -- four where people requested their absentee
9 ballot before they turned 18, but they turned 18
10 by Election Day. That means that is a legally
11 cast ballot.

12 So, again, 66,000, which is the biggest
13 single number they have on these kind of votes,
14 versus zero.

15 They say that there's 2,423 people who
16 voted without being registered. Let's just be
17 clear about this: You can't do it. There cannot
18 be a ballot issue to you. There's no way to tie
19 it back to you. There's no way for them to have a
20 name to correspond back to unless they are
21 registered voters. So that number is zero.

22 Then we've got 1,043 illegally voted using
23 a P.O. Box. Again we're going through the
24 investigation on this; so far everyone we've seen
25 has been when there is a mailboxes, et cetera, or

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1 something like that in a multifamily building,
2 like an apartment, so you will have what looks
3 like P.O. boxes listed in the system, but they're
4 actually the residential address of record for
5 people who live in multifamily housing, like
6 apartments. So that's everything we've seen. So
7 we haven't seen anybody actually registering to
8 vote at a -- at a USPS P.O. Box.

9 The next one is 4,926 voted past the legal
10 registration deadline. Again, it's zero. We have
11 zero record of anybody doing that, because the
12 voter registration cutoff is the voter
13 registration cutoff. So there's -- there's no
14 corresponding way to do that. They couldn't be
15 issued a ballot because they are not legally
16 within the system of that to have ballots issued.
17 10,350 who died before the election.

18 Again, our information from the Department
19 of Vital Records, we go through county by county,
20 shows potentially two. So far two. It could
21 change, it could go -- but it's not 10,000.

22 395 cast ballots in two states, we're
23 investigating that. But again, then -- and we got
24 double voters, which we're investigating -- but
25 again, we're talking handfuls, not tens of

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1 thousands. Let's remember -- I think we're all
2 very clear on the number now, that it was 11,779.
3 We've seen nothing in our investigations of any of
4 these data claims that shows there's nearly enough
5 ballots to change the outcome.

6 And the Secretary and I at this podium have
7 said since November 3rd, there is illegal voting
8 in every single election, in the history of
9 mankind, because there are human beings involved
10 in the process. It's going to happen. It's a
11 question of limiting it and putting as many
12 safeguards as you can in place to make sure it
13 doesn't happen.

14 All right. Oh, yeah, we had part of the
15 hand tally be discussed in relation to the
16 potential double scanning. Let's just go to the
17 other ridiculous claims, the Dominion voting
18 machines are somehow using fractional voting or
19 flipping votes. Again, by doing the hand tally,
20 it shows none of that is true. Not a wit.

21 And let's go back to the overall claims
22 about Dominion voting systems in general. If you
23 look in Wisconsin, they're claiming Wisconsin was
24 stolen through Dominion voting machines. In the
25 14 counties in which Dominion voting machines were

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1 used in Wisconsin, the President got 59 percent of
2 the vote.

3 And the -- in the counties in Pennsylvania
4 where Dominion voting machines were used, he got
5 52 and-a-half percent of the vote; he made a claim
6 at one point that 900,000 votes were deleted by
7 Dominion machines, and the 14 counties where that
8 -- where that happened, they had 1.3 million
9 people vote. That was 70-some-odd percent plus --
10 a 76 percent turnout, in order for 900,000 to have
11 been deleted, they would have had to have 160
12 percent -- no, 130 percent turnout. That did not
13 happen, because it cannot happen.

14 Again, this is all easily provably false;
15 yet, the President persists. And by him doing so
16 undermines Georgian's faith in the election
17 system -- especially Republican Georgians in this
18 case, which is important because we have a big
19 election coming up tomorrow; and everybody
20 deserves to have their vote counted, if they want
21 it to be, Republican and Democrat alike.

22 Now, let's move on to signature matching.
23 There were claims about signature matching being
24 -- not being done. They were -- and they were
25 based on feelings, we believe no specific evidence

1 was ever brought up until in one of the Trump
2 filings there was a specific allegation that
3 signature verification was not being done on the
4 absentee ballot request form properly in Cobb
5 County during the June primary.

6 So that's the first time we had a specific
7 actionable claim of signature match not being
8 done. So with that in mind, the Governor
9 graciously offered -- after the Secretary and he
10 discussed potentially using GBI resources. So we
11 got GBI to come alongside the Secretary of State
12 investigators, multiple teams, Vic Reynolds stood
13 here last week to announce the outcome of that,
14 and of the 15,118 absentee ballot envelopes that
15 they investigated, they found two with potential
16 problems. Two. 99.99 was -- was properly done.

17 And of those two, the actual voter who was
18 intended to be marked as voting, was the actual
19 voter. There -- they could have been done through
20 a cure period, which would be a better way to do
21 that.

22 Another thing they want to talk about is
23 the vast difference in rejection rates. Well,
24 what we've seen is, there was not a vast
25 difference in rejection rates. What's happening

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1 is, in order to confuse people, because they don't
2 understand election systems, is they're conflating
3 the entirety of absentee ballots that were
4 rejected, versus those that were rejected for
5 signature mismatch or missing a signature.

6 Now, we're also comparing apples to
7 oranges. In '16 -- I've done this so long I can't
8 -- I don't want to screw up these numbers, but I'm
9 going to give the general -- don't hold me to this
10 exact number -- I think it was 0.26 percent in
11 '18. It was 0.16 percent and -- in 2020, so far
12 it's 0.15 percent. We've got some updated numbers
13 on this now, and the difference is in 2019, HB316
14 was passed, which allowed there to be curing of
15 ballots. So there are teams of Republicans and
16 Democrats, young people running around the state
17 as we speak, finding people who have signature
18 issues to cure their ballots. That's going on
19 right now.

20 And the Democrats did a much better job of
21 that during the general election; the Republicans
22 were not prepared. The Democrats had their own
23 forms set up, they had teams set up, they were
24 ready to go. It was sort of a late entry on the
25 Republican side to do some of those.

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1 And about 5,000 total ballots were rejected
2 for some purpose, and about 2600 of those were
3 cured; so that means the final rejection number
4 was around 2400 ballots around the total of 5
5 million, or a percentage of 1.3 million that we
6 saw that were voted absentee.

7 Let's go into some of the more new things.
8 There is no shredding of ballots going on. That's
9 not real. It's not happening. There's no --
10 there's shredding of envelopes that were the
11 non-used ones or there's also shredding of the
12 secrecy envelopes that came through; and we saw
13 some of those in the Senate hearing, and it's
14 obvious that they are the secrecy envelopes, which
15 have no evidentiary value, because there's no
16 signature on it, there's no way to match it back,
17 they're just -- they're just basically trash.

18 The -- the law requires you keep the
19 signature and oath envelopes and the ballots
20 themselves for 22 months. Those are all being
21 kept.

22 Let's see -- this is what I don't fully
23 understand: No one is changing parts or pieces
24 out of Dominion voting machines. That is --
25 that's -- that's not a real -- I don't even know

1 that means. It's not a real thing. That's not
2 happening. The President mentioned on the call
3 yesterday or -- or from two days ago that's --
4 again, not real. I don't even know how -- how
5 exactly to explain that.

6 Let's see, Secretary Raffensperger does not
7 have a brother named Ron Raffensperger. That is
8 also not real. The President tweeted that out as
9 well.

10 It's -- let's see. I got such a long list.
11 Oh, yes, the other really fantastical thing we saw
12 the other day was a potential hacking of Dominion
13 equipment during a Senate hearing last week. That
14 did not happen either.

15 Let's go over a couple reasons why: First
16 of all, ballot marking devices and scanners,
17 neither one have modems. It's very hard to hack
18 things without modems. There's nothing to talk
19 to. So let's get that clear.

20 The poll pads, which is a no-ink device,
21 does have the ability to connect to Wi-Fi, which
22 we use it for loading purposes, and in case
23 there's an issue on Election Day, but they are not
24 hooked up live all the time.

25 And if they saw anything -- they could see

1 traffic back and forth, but it would, basically,
2 be like watching a river go by, you couldn't get
3 in. It's -- it's essentially if they did; which
4 we have no proof of.

5 We have claim after claim after claim with
6 zero proof. Zero. And signed affidavits are part
7 of an evidentiary trail, but they have to be
8 investigated. And let's remember, everybody who
9 came and gave testimony -- it was public comment
10 -- at the State Senate hearing; this office was
11 never asked to come and discuss those items with
12 that State Senate hear- -- State Senate
13 subcommittee. That didn't happen either; which I
14 find interesting because, obviously, they're
15 making wild claims that -- again, undermine
16 people's faith in the system.

17 Let's see -- oh, yeah; this is another one
18 that came over the weekend from the former -- from
19 the founder of overstock.com, that they had found
20 thousands and thousands of fake ballots in a
21 Fulton County warehouse. For any of you all in
22 the press who have been to the Fulton County
23 warehouse, these are the emergency ballots that
24 have been sitting in that warehouse since before
25 the November election, very much in plain view,

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1 everybody to see.

2 And what happened -- the reason they had a
3 high number -- first of all, every county has to
4 have those emergency ballots by -- by rule. The
5 State Election Board rule says you have to have 10
6 percent of the available ones for each polling
7 location, and they have to be printed for that
8 polling location for the ballot (inaudible), so
9 they can track it properly.

10 In Fulton County's case, you all may
11 remember that there was a Covid outbreak in their
12 warehouse, not long before the logic and accuracy
13 testing period was happening for the general
14 election. In a very wild abundance of caution
15 they had what they referred to as not Plan A, not
16 Plan B, what they referred to as Plan C, which was
17 if we can't get people in to do the logic and
18 accuracy testing on all of our equipment, we're
19 going to print up 100 percent of our ballots we
20 need to let hand-marked ballots be what we have to
21 do if we cannot get the machines done.

22 They did that out of an abundance of
23 caution given the unknowable unknowns surrounding
24 Covid and their ability to get employees in to do
25 that. They were thankfully able to get the

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1 employees in. Dominion staff came in to help them
2 make sure they got a logic and accuracy test done;
3 so they were able to deploy all of their BMVs and
4 BMD carriers and scanners, so they didn't have to
5 use those ballots; but that's why those ballots
6 existed.

7 They are not fake ballots. They are real
8 ballots. They are unused ballots. And what I
9 find really interesting about this is they were in
10 shrinkwrapped items, in boxes that are sealed;
11 what can you do with those? They're sitting right
12 there. Everybody saw them.

13 Let's see -- I'm trying to think what --
14 what other -- here's part of the problem, y'all --
15 I sit (inaudible) try to write down everything
16 that we see that comes over the Internet as a --
17 as a potential thing of disinformation. It gets
18 exploded. We all look at these things, we know
19 there's lots of bots that are doing it. We have
20 foreign powers that are pushing some of these
21 things at the same time.

22 So here's the takeaway from all this: This
23 office has been open and transparent. We are
24 continuing investigations. There are questions
25 about pristine ballots. That's one last thing,

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1 the pristine ballot thing. There are three
2 reasons you can have the, quote-unquote, pristine
3 ballot; which is, essentially, the absentee,
4 slash, emergency, slash, provisional ballot.

5 There's -- the first one, military and
6 overseas voters oftentimes will get what they call
7 an electronic ballot; what happens is, once we get
8 the ballot built, starting the 49th or the 45th
9 day, we will send e-mails out to those people who
10 -- who want to have electronic ballot delivery,
11 which is many of our military servicemen and
12 women. So they take that, they print it, and they
13 bubble in their choices.

14 Now, obviously, that's on an eight
15 and-a-half by 11 piece or 11 by 14 where they can
16 print it on, so it's not sized properly to go
17 through a scanner. So when that comes back to the
18 county, they will duplicate that on a flat,
19 unfolded piece of paper, on the absentee ballot,
20 slash, emergency ballot. That's a normal process
21 for many of the military and overseas voters that
22 are electronically delivered.

23 The other situation you might see that in
24 is an emergency ballot situation. If a ballot
25 marking device goes down or wasn't used, which is

1 the case we saw in the morning in Spalding County
2 on Election Day, they will use the emergency
3 ballots as backup. And those will just be scanned
4 directly in the machine and not folded. And the
5 -- the final place you would see that is on a
6 damaged or adjudicated ballot that was not
7 adjudicated through the electronic system. Or in
8 Fulton's case, what you saw was they were putting
9 so many of the absentee ballots through their
10 cutters, that occasionally it would catch the
11 ballot itself and slice it.

12 In Fulton County's case they did the vast
13 majority -- I think 100 percent of their
14 duplication on a BMD. In Cobb County's location,
15 I think they did all those on hand-marked paper
16 ballots. So there's a difference of use and
17 processes within each one of the counties. So
18 that's why you would see quote/unquote pristine
19 ballots.

20 Wednesday: We've all heard the reports
21 that there's going to be several Senators and
22 Congressmen who will be objecting to the electors
23 being seated. We anticipate that each time they
24 do that they're going to go -- they'll separate
25 out, they'll have a debate for two hours, the

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1 State of Georgia's electors will get seated, they
2 will look at this evidence, as best they can, in
3 such a way and it will be voted on by the House
4 and Senate; and we anticipate that, and that will
5 approve our certification was proper at the end of
6 the day, and that we followed the process
7 properly.

8 And I -- and I give you back to Senator Tom
9 Cotton's statement from earlier today, he says
10 this is the process that we follow, this is the
11 appropriate step under the Constitution of the
12 laws in the State of Georgia, and the laws in the
13 United States.

14 So with that, I want to say: If you're a
15 Georgia voter, if you want your values reflected
16 by your elected officials, I strongly beg and
17 encourage you go vote tomorrow. Do not let
18 anybody discourage you. Do not self-suppress your
19 own vote. Do not make a self-fulfilling prophecy
20 out of doing this. Don't let anybody steal your
21 vote that way.

22 And that's what's happening, if you
23 self-suppress you're -- you're taking away your
24 important voice from this election.

25 So with that, I'll go ahead and take any

1 questions y'all got. Sorry? Oh, sorry. I got
2 (inaudible) microphone back there. Justin?

3 JUSTIN: Hey. Yeah, is the Secretary of
4 State or the State Election Board considering
5 asking either the Fulton D.A., or the Georgia
6 Attorney General, to investigate the call with the
7 President over the weekend?

8 GABRIEL STERLING: I do not know that.

9 JUSTIN: Any discussions of that?

10 GABRIEL STERLING: Not that I'm aware of.

11 REPORTER: From all that you said there --
12 I mean, do you believe, as some have said, that
13 what happened in that phone call was -- was an
14 attack --

15 GABRIEL STERLING: I'm having a really hard
16 time hearing you. I apologize.

17 REPORTER: I'll go there. Do you believe
18 that some have said that this is an attack on
19 democracy --

20 GABRIEL STERLING: There we go.

21 REPORTER: You can hear that. I'll start
22 again.

23 GABRIEL STERLING: Yes.

24 REPORTER: As some have said, do you
25 believe that what happened in that phone call was

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1 an attack on democracy?

2 GABRIEL STERLING: I'll leave other people
3 to make the decision on that. I personally found
4 it to be something that was not normal, out of
5 place, and -- and nobody I know who would be
6 President would do something like that to a
7 Secretary of State.

8 REPORTER: Thank you.

9 GABRIEL STERLING: Yes, Mark.

10 MARK: Afternoon. Looking forward to
11 tomorrow. Have you heard about any threats or
12 security problems or anything that could interfere
13 with people voting, and also what do you expect
14 turnout to be like tomorrow?

15 GABRIEL STERLING: Well, I anticipate there
16 will be a high turnout, and there's a -- there's a
17 large bucket of voters in -- in many congressional
18 districts that could potentially show up. We
19 anticipate there could be any number of potential
20 threats out there that could be attempting to
21 encourage or discourage turnout.

22 We encourage everybody to please turn out,
23 and be safe, be smart; and don't let anybody get
24 in the way of you casting your vote.

25 MARK: And have you heard about any

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1 threats, will there be extra security?

2 GABRIEL STERLING: We've discussed with
3 GBI, FBI and sheriffs' departments potentially
4 there being threats. And we've seen some of that
5 nature potentially out there that are under
6 investigation.

7 Yes, ma'am.

8 REPORTER: Hi. Hi, Gabe. Lane Alexander
9 with NBC news. Following up very quickly on
10 Justin's question: Two members of the Board of
11 Elections, the state Board of Elections have
12 called on the Secretary of State's office to
13 investigate that phone call; how is the
14 Secretary's office responding, is there any plan
15 to investigate or will they block that -- will you
16 block that investigation anyway?

17 GABRIEL STERLING: I'm not aware of any
18 discussion specifically on that yet; but I'm sure
19 it will be taken under -- under advisement.

20 REPORTER: And I'll ask you very quickly
21 about the secretary's desire to have that phone
22 call recorded; why did he want that call recorded,
23 was he concerned about anything improper being
24 said or that he may need to release it later?

25 GABRIEL STERLING: I think given the

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1 environment we're in right now, and political
2 situation that we're in, and the history of the
3 President -- knowing that he sometimes doesn't
4 necessarily characterize things as they might have
5 actually occurred, it was a -- out of an abundance
6 of caution. But I'm sure many people -- I'm sure
7 the President's side recorded it, too. So it --
8 they might have been the ones that leaked part of
9 that as well.

10 REPORTER: Thank you.

11 REPORTER: (Inaudible) with Fox News
12 National. How do you interpret the President
13 asking the Secretary of State to, quote, find
14 votes on that phone call; is it fair to say the
15 President was asking the Secretary of State to
16 fraudulently find or flip votes?

17 GABRIEL STERLING: I don't know he was
18 trying to fraudulently find the votes; but the
19 thing is, we have certified this election, so
20 there are no more votes to find. And we -- we
21 will continue investigations, and he has an
22 election challenge. And one of the things they
23 were discussing on that phone call was they have
24 sued the State of Georgia and the Secretary of
25 State.

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1 There are rules of evidence to follow once
2 you do that; trying to go outside of that is an
3 issue. And we've said -- we've said -- I believe
4 we sent their -- our lawyers had sent their
5 lawyers a letter saying: If you want to dismiss
6 your challenge, we're more than happy to share
7 this data with you to show that your data is
8 incorrect and you have, in fact, lost the State of
9 Georgia.

10 REPORTER: The Bureau of Investigation says
11 there's an unprecedented number of threats
12 statewide; are you aware of any of those types of
13 threats (inaudible) --

14 GABRIEL STERLING: I'm sorry, I didn't --
15 the unprecedented number of threats, what?

16 REPORTER: The Bureau of Investigation says
17 that there's an unprecedented number of threats
18 that have come in statewide regarding the
19 election; we're not sure the nature of those
20 threats.

21 Are you aware of what type of threats you
22 guys may --

23 GABRIEL STERLING: We're aware of some, but
24 we're trying to not discuss in too much detail
25 about that while they try to investigate and find

1 out what the actual nature of those threats may
2 be.

3 REPORTER: Hey, Gabe. Konstantin Toropin
4 with CNN. So I -- this is now the second sort of
5 conversation that the Secretary of State had --
6 that has been reported out on this topic; first it
7 was Lindsey Graham earlier in November, and now
8 the President.

9 Has the -- has the Secretary of State's
10 office been contacted by any other members of the
11 Trump Administration or GOP officials?

12 GABRIEL STERLING: Well, I mean, our office
13 is contacted by Democrats/Republicans like pretty
14 consistently to discuss election issues. So yes,
15 that -- that has occurred. Specifically, I --
16 it's a little bit of a broad question, I think.
17 But we -- we get contacted by members of the
18 Administration. We get contacted by Democrats.
19 We get (inaudible) by Republicans.

20 REPORTER: Have -- have you been contacted
21 by on -- the topic of these -- some of these
22 conspiracy theories that you've outlined today?

23 GABRIEL STERLING: I mean, no more than my
24 normal of having to explain the ridiculousness of
25 many this -- this disinformation. So thank you

1 all very much.

2 REPORTER: Excuse me. The Secretary of
3 State was asked by a federal judge to meet with
4 Black Voters Matter to return wrongly (inaudible)
5 purged voters back to the voter rolls. Why do you
6 refuse to meet with the Black Voters Matter before
7 this vote?

8 This is the second time you've ducked this
9 question. And it's the third time you ducked
10 Black Voters Matter. Okay. Greg Powell
11 (inaudible) radio network. Thank you.

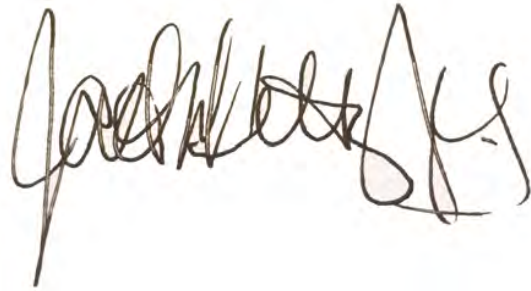
12 (End of the recording.)
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I, Jackie Mentecky, Transcriptionist/Court Reporter, do hereby certify that I was authorized to transcribe the foregoing recorded proceeding, and that the transcript is a true and accurate transcription of my shorthand notes to the best of my ability taken while listening to the provided recording.

Dated this 7th day of January, 2021.

A handwritten signature in dark ink, appearing to read 'Jackie Mentecky', is written over a horizontal line.

Jackie Mentecky

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Trump still wins small Michigan county after hand recount

December 18, 2020



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BELLAIRE, Mich. (AP) — A livestreamed recount of the presidential election in a small Michigan county turned up no sign of shenanigans Thursday, only a handful of additional votes for President Donald Trump.

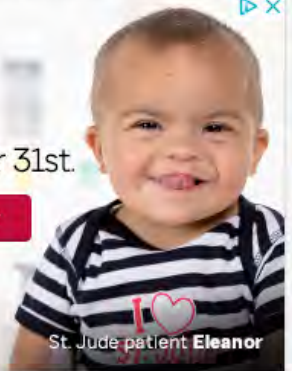
Trump padded his Antrim County victory with 11 more votes, while Joe Biden lost one. The Republican county in the northern Lower Peninsula has been under intense scrutiny since the Nov. 3 election when initial results showed a local victory for Biden.

It was attributed to human error, not any problems with voting machines, and corrected. But a judge still took the extraordinary step of allowing a resident to take forensic images of election equipment.

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The hand tally “confirmed the truth and affirmed the facts: Dominion’s voting machines accurately tabulated the votes cast for president in Antrim County,” said Secretary of State Jocelyn Benson.

“It is time for the disinformation campaigns to stop, and for elected and other leaders on both sides of the aisle to unequivocally affirm that the election was secure and accurate,” Benson said.

Biden lost Antrim County but won Michigan by 154,000 votes.

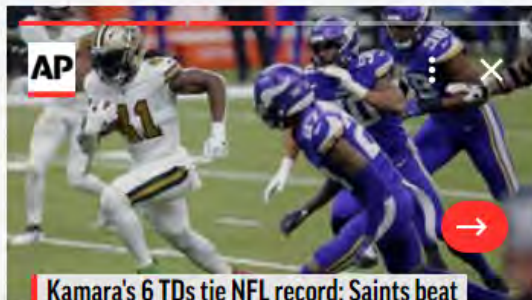


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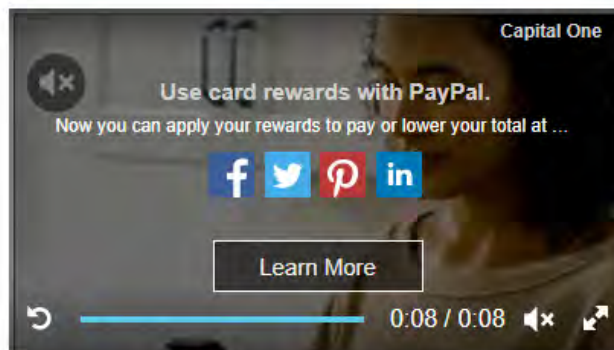


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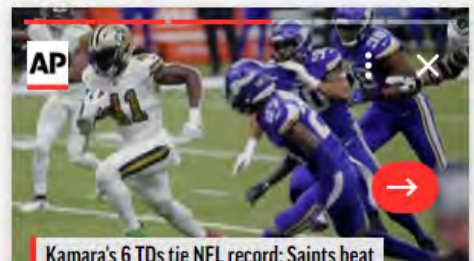
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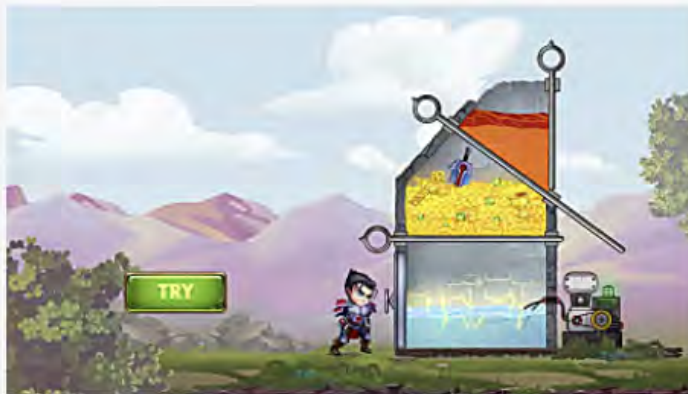
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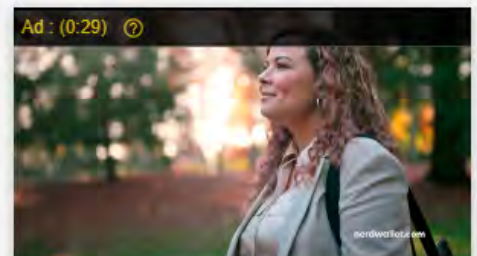
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Exhibit 16



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The Times Called Officials in Every State: No Evidence of Voter Fraud

The president and his allies have baselessly claimed that rampant voter fraud stole victory from him. Officials contacted by The Times said that there were no irregularities that affected the outcome.



Frank LaRose, a Republican who serves as Ohio's secretary of state, reported no serious irregularities with voting in last week's election. Maddie McGarvey for The New York Times



By [Nick Corasaniti](#), [Reid J. Epstein](#) and [Jim Rutenberg](#)

Published Nov. 10, 2020 Updated Nov. 19, 2020

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By Nick Corasaniti, Reid J. Epstein and Jim Rutenberg

Published Nov. 10, 2020 Updated Nov. 19, 2020

PHILADELPHIA — Election officials in dozens of states representing both political parties said that there was no evidence that fraud or other irregularities played a role in the outcome of the presidential race, amounting to a forceful rebuke of President Trump's portrait of a fraudulent election.

Over the last several days, the president, members of his administration, congressional Republicans and right wing allies have put forth the false claim that the [election](#) was stolen from Mr. Trump and have refused to accept [results](#) that showed Joseph R. Biden Jr. as the winner.

But top election officials across the country said in interviews and statements that the process had been a remarkable success despite record turnout and the complications of a dangerous pandemic.

“There’s a great human capacity for inventing things that aren’t true about elections,” said Frank LaRose, a Republican who serves as Ohio’s secretary of state. “The conspiracy theories and rumors and all those things run rampant. For some reason, elections breed that type of mythology.”

ELECTION RESULT [Can Trump still win?](#) No. He already lost

Steve Simon, a Democrat who is Minnesota’s secretary of state, said: “I don’t know of a single case where someone argued that a vote counted when it shouldn’t have or didn’t count when it should. There was no fraud.”

“Kansas did not experience any widespread, systematic issues

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There was no fraud.”

“Kansas did not experience any widespread, systematic issues with [voter fraud](#), intimidation, irregularities or voting problems,” a spokeswoman for Scott Schwab, the Republican secretary of state in Kansas, said in an email Tuesday. “We are very pleased with how the election has gone up to this point.”

The New York Times contacted the offices of the top election officials in every state on Monday and Tuesday to ask whether they suspected or had evidence of illegal voting. Officials in 45 states responded directly to The Times. For four of the remaining states, The Times spoke to other statewide officials or found public comments from secretaries of state; none reported any major voting issues.

Statewide officials in Texas did not respond to repeated inquiries. But a spokeswoman for the top elections official in Harris County, the largest county in Texas with a population greater than many states, said that there were only a few minor issues and that “we had a very seamless election.” On Tuesday, the Republican lieutenant governor in Texas, Dan Patrick, announced a \$1 million fund to reward reports of voter fraud.

Editors' Picks

Uncovering Lost Black History, Stone by Stone

No More All-Nighters!

How My Father Escaped Jail for Christmas

Some states described small problems common to all elections, which they said they were addressing: a few instances of illegal or double voting, some technical glitches and some minor errors in math. Officials in all states are conducting their own review of the voting — a standard component of the [certification process](#).

TRACKING VIRAL MISINFORMATION Every day, *Times* reporters chronicle and [debunk false and misleading information](#) that is going viral online.

Perhaps none of the Trump campaign's claims received more

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Perhaps none of the Trump campaign's claims received more attention than an allegation made over the weekend in Pennsylvania by Rudolph W. Giuliani, the president's personal lawyer. On Saturday, Mr. Giuliani held a news conference in the parking lot of a Philadelphia landscaping company and claimed that the election in the city had been rife with fraud.

The office of the state's top law enforcement official said that there was no evidence to support Mr. Giuliani's claims, and that the election in the state was "fair and secure."

"Many of the claims against the commonwealth have already been dismissed, and repeating these false attacks is reckless," said Jacklin Rhoads, a spokeswoman for Josh Shapiro, a Democrat who is Pennsylvania's attorney general. "No active lawsuit even alleges, and no evidence presented so far has shown, widespread problems."



Ballots were counted in Atlanta last week. President-elect Joseph R. Biden Jr. leads by more than 11,000 votes in Georgia. Lynsey Weatherspoon for The New York Times

What emerged in The Times's reporting was how, beyond the president, Republicans in many states were engaged in a widespread effort to delegitimize the nation's voting system.

ON POLITICS WITH LISA LERER: *A guiding hand through the political news cycle, telling you what you really need to know.*

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Some Republicans have even turned to lashing members of their

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Some Republicans have even turned to lashing members of their own party who, in their eyes, did not show sufficient dedication to rooting out fraud. In Georgia, where Mr. Biden is leading, the two Republican senators, Kelly Loeffler and David Perdue, both of whom are in a runoff to gain re-election, have [called for the resignation of the Republican secretary of state, Brad Raffensperger](#). “The secretary of state has failed to deliver honest and transparent elections,” the senators said in a statement.

In Washington, the losing Republican candidate for governor, Loren Culp, has disputed the Republican secretary of state’s determination that the election there was free of fraud. The secretary of state, Kim Wyman, has in turn challenged Mr. Culp, trailing by roughly 14 percentage points [in the results](#), to produce evidence. “It’s just throwing grass at the fence at this point,” she said in an interview. “See what sticks.”

Democrats have more frequently been the target of criticism. Last week, the Republican leadership of the Pennsylvania state legislature called [on Kathy Boockvar](#), the Democratic secretary of state, to step down. In [Wisconsin](#), the Republican speaker of the Assembly announced he would form committees to investigate voter fraud in the wake of Mr. Biden’s narrow victory in the state, though there is no evidence of any. Republican lawmakers in Michigan on Saturday voted to [issue subpoenas for documents](#) in search of “election irregularities.”

Indeed, Republicans in all three “blue wall” states have initiated “investigations” or called for audits — which is redundant given the certification work already underway. Democrats say this is simply a way to undermine confidence in the results.

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the certification work already underway. Democrats say this is simply a way to undermine confidence in the results.

On Monday, the Trump campaign accelerated their legal efforts, filing a lawsuit in the seven Pennsylvania counties where the president lost that claimed mail voting created an unfair, “two-tiered” system during the election — though the system is also in place in counties the president won. The campaign also announced plans to file another suit in Michigan.

The president has kept up a barrage of Twitter posts with false claims about improprieties in Nevada and Pennsylvania, predicting he’d prevail in Georgia, where he is behind, and said Wisconsin “needs a little time statutorily,” though he offered no explanation for what he meant.

Nellie Gorbea, the Democratic secretary of state in Rhode Island, said the amount of attention on the election would make illegal voting extremely difficult. “It would be nearly impossible to do voter fraud in this election because of the number of people tuned in,” she said.

Voting fraud in the United States is extremely rare. The irregularities that do occur are often inconsequential, isolated in nature, and unlikely to alter the outcome of an election. The most significant episode of election fraud over the past several years involved an alleged effort to manipulate ballots to benefit a Republican candidate for Congress in North Carolina, Mark Harris, in 2018. The scheme forced [a new election](#) and an operative who worked for Mr. Harris, [L. McCrae Dowless](#), is under indictment. Mr. Harris was not charged with wrongdoing, and denied any role.

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Republican leadership of the Pennsylvania state legislature called on Kathy Boockvar, the secretary of state of Pennsylvania and a Democrat, to step down.
Gabriela Bhaskar for The New York Times

In the case of the 2020 election, Mr. Biden's margins in the blue wall states of Pennsylvania, Michigan and Wisconsin are all in the tens of thousands. Even in Georgia, where Mr. Biden leads by more than 11,000 votes, it would be hard to uncover enough voting irregularities to change who won.

"We have not seen any evidence of fraud or foul play in the actual administration of the election," said Jake Rollow, a spokesman for Jocelyn Benson, the Democratic secretary of state in Michigan. "What we have seen is that it was smooth, transparent, secure and accurate."

Still, Mr. Trump has been fixated on voter fraud since 2016, when he falsely claimed that vote stealing had cost him the popular vote, which he lost by roughly 3 million. In the election's aftermath, he formed a voting fraud commission that disbanded with no findings amid charges of secrecy, bias and overreach.

Mr. Trump's attack on the election system this year has relied on either outright fabrication or gross exaggeration involving the sorts of small problems that typically come up in elections.

In Ohio, for instance, Mr. LaRose said that while it was not unusual to discover a handful of improprieties in a statewide election, systemic fraud has not happened.

"In the past, I've referred people to local prosecutors and the attorney general for noncitizens voting," he said. "It's like tens or dozens of people, not hundreds. There's no acceptable level of voter fraud and we take every one of those cases seriously."

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The tension over voting has been most palpable in Georgia. The Trump campaign and the two Republican senators have complained about transparency, which Mr. Raffensperger, the secretary of state, called “laughable.”

“We were literally putting releases of results up at a minimum hourly,” he said in a statement. “I and my office have been holding daily or twice-daily briefings for the press to walk them through all the numbers. So that particular charge is laughable.”

He added that while there were likely small instances of fraud, he did not expect it to be significant enough to affect the outcome.

The absence of any major findings of fraud or irregularities, and the willingness of even Republican election officials to attest to smooth operations, have also undercut Mr. Trump’s legal efforts.

In Michigan, the Trump campaign has sued, saying that their poll watchers were not given access to properly observe ballot counting in Detroit. But election officials in the city deny that, saying there were [dozens of poll watchers](#) from both campaigns inside the main counting center there.



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Gabriel Sterling, the voting implementation manager in the Georgia Secretary of State's office, has methodically debunked various claims of voting irregularities and systemic issues. Megan Varner/Getty Images

Last week, a judge denied a Trump campaign bid to halt counting based on complaints about observers, [dismissing](#) key evidence as “vague” and as “hearsay.”

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The accusations of fraud from the president and his allies were noticeably absent from states where Mr. Trump and his fellow Republicans did well.

In South Carolina, for instance, the Republican incumbent, [Senator Lindsey Graham](#), won relatively easily over Jaime Harrison, despite the fact that polls showed a tight race there. The South Carolina Election Board chairman John W. Wells said late Monday, “I have not heard of any” substantive allegations of fraud in the state, though he added he would await a final determination in the [certification and protest](#) process.

Asked if Mr. Graham was concerned about results in his state, a spokesman said the senator has “discussed states where the margins are close” but invited South Carolina voters to step forward with any “evidence of fraud or irregularities.”

Mr. Graham, a close ally of Mr. Trump, has taken up the president's cause. He asked the Department of Justice to investigate claims

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POLITICS The Times Called Officials in Every State No Evidence of Voter Fraud
margins are close but invited South Carolina voters to step forward with any "evidence of fraud or irregularities."

Mr. Graham, a close ally of Mr. Trump, has taken up the president's cause. He asked the Department of Justice to investigate claims made in an affidavit the Trump campaign shared with him from a Postal Service worker in Erie, Pa. The worker made allegations of impropriety at the local Postal branch based largely on a conversation he said he overheard.

Late Tuesday, the credibility of that affidavit came into question after the House Oversight Committee reported [on Twitter](#) that the worker recanted his story in discussions with the Postal Service's Office of Inspector General. The worker later denied he recanted in an online video.

One of the secretaries of state who did not respond to requests for comment about the election in his state was Corey Stapleton of Montana, an outgoing Republican. But Mr. Stapleton did post a message implicitly addressing the president's ongoing fraud claims. "I have supported you, Mr. President," [he wrote](#). "[@realDonaldTrump](#) accomplished some incredible things during your time in office! But that time is now over! Tip your hat, bite your lip, and congratulate [@JoeBiden](#)."

Michael Wines, Mike Baker, Giulia McDonnell Nieto del Rio and Will Wright contributed reporting.

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Jim Rutenberg is a writer-at-large for The Times and the Sunday magazine. He was previously the media columnist, a White House reporter and a national political correspondent. He was part of the team that won the Pulitzer Prize for Public Service in 2018 for exposing sexual harassment and abuse. [@jimrutenberg](#)

A version of this article appears in print on Nov. 11, 2020, Section A, Page 1 of the New York edition with the headline: Election Officials Nationwide Find No Fraud. [Order Reprints](#) | [Today's Paper](#) | [Subscribe](#)

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Exhibit 17



NATIONAL

How Misinformation Lit The Fire Under A Year Of Political Chaos In Michigan

January 1, 2021 · 12:59 PM ET

ABIGAIL CENSKY

FROM WKAR



Supporters of President Trump bang on the glass and chant slogans outside the room where absentee ballots for the 2020 general election were counted at TCF Center on November 4, in Detroit, Mich.

Jeff Kowalsky/AFP via Getty Images

The day Michigan's electors gathered in the state Capitol, Gov. Gretchen Whitmer paused briefly on the checkered marble floor before entering the state Senate chamber.

"Obviously [we] never could've imagined..." she paused to laugh, emphasizing her next word, "anything... about this year. But it's an honor to play a role here in finalizing this vote, respecting the will of the people and making sure Michigan's voice is heard."

That day, electors were escorted in by the state police. The building itself was closed to the public and other lawmakers because of credible threats



emphasizing her next word "anything" about this year. But it's an honor to play a role here in finalizing this vote, respecting the will of the people and making sure Michigan's voice is heard."

That day, electors were escorted in by the state police. The building itself was closed to the public and other lawmakers because of credible threats of violence after more than six months of political turmoil in the state.

That evening, after weeks of rampant allegations of election fraud by President Trump's supporters, the Republican state Senate Majority Leader Mike Shirkey tweeted that the Michigan Senate had "not discovered material proof of malicious behavior thus far. If Sidney Powell or anyone else has concrete proof that voting machines were manipulated, it's past time they share it."

But the damage was already done. Outside, state police blocked a handful of Republican state representatives who tried to gain access to the building in order to seat an alternate slate of electors as the state's 16 electoral votes were cast for Joe Biden, who won the state by 154,188 votes.

Article continues after sponsor message



In the dumpster fire year of 2020, Michigan has had its own political storm going all the way back to the March primary when the state detected its first cases of COVID-19. The weekend before, Vermont Sen. Bernie Sanders drew thousands to rallies in Ann Arbor and Grand Rapids and President-Elect Joe Biden gathered large crowds in Detroit.

Protests and the alleged plot to kidnap the governor

In the spring, frustration with Gov. Whitmer's stay-at-home orders manifested in the country's largest so-called [gridlock protest](#) in Lansing, followed by protests that rippled into the spring. Rallies became a place where [extreme views](#) and conspiracies could grow. Rally attendees who



Protests and the alleged plot to kidnap the governor

In the spring, frustration with Gov. Whitmer's stay-at-home orders manifested in the country's largest so-called [gridlock protest](#) in Lansing, followed by protests that rippled into the spring. Rallies became a place where [extreme views](#) and conspiracies could grow. Rally attendees who alleged Whitmer was a tyrant mingled with anti-vaxxers and heavily-armed protesters.

At a June protest, as an FBI criminal complaint later revealed, men linked to the [militia movement](#) who believed some state governments were violating the U.S. constitution, allegedly attempted to recruit others to attack the state Capitol and join their plan to kidnap Whitmer and try her for treason.

"Anytime you're in a position of uncertainty, you're going to be more willing to accept things that are false or misleading, so long as they just make you feel better," says Dustin Carnahan, who studies misinformation as an associate professor of Communications at Michigan State University. "And I don't think that was unique to us."

But Carnahan says being a swing state made Michigan vulnerable to those who wanted to influence or sow doubt in 2020 politics.

Carnahan says that misinformation wasn't central to the alleged plot to kidnap the governor or the protests, but kernels of misinformation were allowed to grow into larger conspiracies.

"What becomes dominant is the conspiracy — this overall kind of belief that this is part of some larger plot to seize control," says Carnahan.

The election

Immediately after the November election, misinformation was warped — some unwittingly, some in deliberate disinformation campaigns — into broader conspiracy theories. One theory alleged that widespread voter fraud had occurred at the absentee counting board in Detroit. Another claimed a [clerical error](#) in a rural Michigan county was evidence of a Dominion Voting System software manipulation. In Wayne County, some argued that disagreements should have prevented [the certification](#) of election results.

Underneath those, though, some say it was the failure to change state law around [absentee ballot processing](#) that created a post-election environment ripe for informational manipulation.



Common Voting System Software Manipulation in Wayne County, some argued that the legislature has not had enough time to certify the election results.

Underneath those, though, some say it was the failure to change state law around absentee ballot processing that created a post-election environment ripe for informational manipulation.

By law, Michigan's more than 3 million absentee ballots could not be counted until election day. That night, it appeared as if President Trump had the lead, but by Wednesday as absentee ballots continued to be counted, Biden pulled ahead and Republican groups began recruiting supporters to flood the TCF center in downtown Detroit where absentee ballots were being counted. Protesters banged on glass windows chanting "stop the vote."

"The American people need to have confidence in our elections," declared Republican National Committee Chairwoman Ronna McDaniel, standing in front of a wall emblazoned with red, white, and blue Trump-Pence 2020 and "Keep America Great" signs. "Right now, we don't have that because across the country Democrat officials are shutting down transparency, especially here in the state of Michigan."

The press conference was just the beginning. What followed were countless lawsuits, affidavits from aggrieved Republican poll watchers and clerical errors that were touted by senior party officials as evidence of irregularities in the state.

Over the following weeks, the President repeatedly tweeted false claims about the election in Michigan and other states. After one board of county canvassers voted not to certify their election results (a move they reversed before their meeting adjourned) Trump falsely announced, "Wow! Michigan just refused to certify the election results! Having courage is a beautiful thing. The USA stands proud!"

In fact, at their scheduled meeting nearly a week later, the Board of State Canvassers certified the results that President-Elect Joe Biden won the state by 154,188 votes.

Yet Republicans in the state say they continued to field calls from angry supporters who believed assertions of widespread fraud, even after they were thrown out of state and federal courts. The Republican-controlled state legislature held oversight hearings into alleged "irregularities" allowing witnesses, many of whose affidavits had been tossed out of court, to testify in blockbuster hours-long hearings.



supporters who believed assertions of widespread fraud, even after they were thrown out of state and federal courts. The Republican-controlled state legislature held oversight hearings into alleged "irregularities" allowing witnesses, many of whose affidavits had been tossed out of court, to testify in blockbuster [hours-long hearings](#).

Former Director of Elections, Chris Thomas, who served a long tenure under both Democratic and Republican Secretaries of State, explained it this way while testifying under oath:

"Few elections are perfect. There are mistakes for sure. However, it is an unreasonable leap to equate mistakes with fraud. Quite simply fraud is not a mere mistake. Fraud requires intent."

It isn't unusual for misinformation that begins with some small element of truth to make way for a larger conspiracy with the power to erode faith in the democratic process, says Carnahan, the associate professor of Communications at Michigan State University.

"To what extent do we allow these people to have a platform to make their points, no matter how unfounded or misleading they are?" he asks.

Fallout from Giuliani in Lansing

When Rudy Giuliani, President Trump's lawyer, appeared in Lansing with witnesses to present allegations of election fraud, state Rep. Cynthia Johnson, a Democrat who represents Detroit, asked why witnesses weren't testifying under oath and why there were no Democratic election workers testifying.

"The world is watching us right now," Johnson said, pressing the Republican committee chair to answer her questions before he gaveled her down for being out of order.

After the hearing, clips of Johnson circulated on conservative media. Johnson [received lynching and death threats](#), some of which she made public. When she posted a Facebook Live video urging her supporters to "Do right. Be in order. Make them pay," edited clips made the rounds on the conservative social media site Parler. Johnson was later stripped of her committee assignments by Republican leadership for making threatening statements.

Johnson told the *Michigan Advance* she viewed the backlash as a "digital lynching." At later hearings, the CEO of Dominion Voting Systems and a former longtime elections director were put under oath.



Johnson told the *Michigan Advance* she viewed the backlash as a "digital lynching." At later hearings, the CEO of Dominion Voting Systems and a former longtime elections director were put under oath.

Days before Christmas, Senate Majority Leader Mike Shirkey told *Bridge Michigan*, "Our investigation, which has been very intense, discovered none, none of the allegations and accusations against Dominion [are] true."

"The legislature had the right and responsibility to review election systems and air-out serious claims of fraud," says Republican public relations consultant John Sellek, which gave clerks an opportunity to lay out the facts.

But in attempting to wage peace with angry Trump voters state legislators also allowed, "Giuliani and his team put on an embarrassing show that ultimately exposed the clear lack of evidence of voter fraud and likely backfired with somewhat-questioning voters who then saw the entire thing turned into a skit on Saturday Night Live," says Sellek.

He says after a year rife with misinformation and conspiracy, "Frankly, it is what comes next as far as election security and conspiracy busting that will matter most."



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Exhibit 18



Maricopa County

Board of Supervisors

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November 17, 2020

Dear Maricopa County voters,

Members of the Board of Supervisors continue to hear from government leaders and the public about the integrity of Maricopa County elections. We want to assure you that proper steps have been taken to ensure a full and accurate count of all votes.

Here are the facts:

- The evidence overwhelmingly shows the system used in Maricopa County is accurate and provided voters with a reliable election. On Election Day, fewer than 200 ballots had an over vote on the presidential race out of more than 167,000 ballots cast.
- The Dominion tabulation equipment was vetted by a bipartisan, "Equipment Certification Advisory Committee" before the contract was finalized. As required by law (A.R.S 16-442), the committee tested the functionality and accuracy of tabulation equipment before it was used in any Arizona elections.
- The Dominion tabulation equipment met mandatory requirements during logic and accuracy testing before the Presidential Preference Election, the Primary Election and the General Election. And after each of these 2020 elections, the hand count audit showed the machines generated an accurate count. ([See Fact Page](#))
- Last week, the Elections Department conducted the mandatory hand count of Election Day ballots from two percent of vote centers and 1 percent of Early Ballots as required by Arizona law and it yielded a 100 percent match to the results produced by the tabulation equipment. All three political parties participated in the hand count audit. This is a statistically significant sample of thousands of votes, which would have caught irregularities.
- There are triggers in Arizona law to require another hand count or even a recount in the case of a close contest. None of those thresholds have been met during the 2020 General Election.

More than 2 million ballots were cast in Maricopa County and there is no evidence of fraud or misconduct or malfunction. Board members listened to and considered many theories about the election results. We asked, and continue to ask critical questions of County staff and none of these theories have proven true or raised the possibility the outcome of the election would be different.

The Board is required to canvass the election by November 23, 2020 (A.R.S 16-642). It is time to dial back the rhetoric, rumors, and false claims. I appreciate the efforts of our elections staff who worked tirelessly to run this election during a pandemic. No matter how you voted, this election was administered with integrity, transparency and in accordance with state laws.

Thank you,

A handwritten signature in black ink, appearing to read "Clint Hickman", with a long horizontal line extending to the right.

Clint Hickman

Chairman, Maricopa County Board of Supervisors

Exhibit 19



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& INFRASTRUCTURE
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JOINT STATEMENT FROM ELECTIONS INFRASTRUCTURE GOVERNMENT COORDINATING COUNCIL & THE ELECTION INFRASTRUCTURE SECTOR COORDINATING EXECUTIVE COMMITTEES

Original release date: November 12, 2020

WASHINGTON – The members of Election Infrastructure Government Coordinating Council (GCC) Executive Committee – Cybersecurity and Infrastructure Security Agency (CISA) Assistant Director Bob Kolasky, U.S. Election Assistance Commission Chair Benjamin Hovland, National Association of Secretaries of State (NASS) President Maggie Toulouse Oliver, National Association of State Election Directors (NASED) President Lori Augino, and Escambia County (Florida) Supervisor of Elections David Stafford – and the members of the Election Infrastructure Sector Coordinating Council (SCC) – Chair Brian Hancock (Unisyn Voting Solutions), Vice Chair Sam Derheimer (Hart InterCivic), Chris Wlaschin (Election Systems & Software), Ericka Haas (Electronic Registration Information Center), and Maria Bianchi (Democracy Works) – released the following statement:

“The November 3rd election was the most secure in American history. Right now, across the country, election officials are reviewing and double checking the entire election process prior to finalizing the result.

“When states have close elections, many will recount ballots. All of the states with close results in the 2020 presidential race have paper records of each vote, allowing the ability to go back and count each ballot if necessary. This is an added benefit for security and resilience. This process allows for the identification and correction of any mistakes or errors. **There is no evidence that any voting system deleted or lost votes, changed votes, or was in any way compromised.**

“Other security measures like pre-election testing, state certification of voting equipment, and the U.S. Election Assistance Commission’s (EAC) certification of voting equipment help to build additional confidence in the voting systems used in 2020.

“While we know there are many unfounded claims and opportunities for misinformation about the process of our elections, we can assure you we have the utmost confidence in the security and integrity of our elections, and you should too. When you have questions, turn to elections officials as trusted voices as they administer elections.”

###

Topics: Election Security

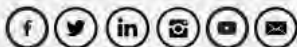
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FILE NAME:

Sidney Powell Dems will use Lawfare to alter election
(4:25 min)

TRANSCRIPT OF VIDEO-RECORDED INTERVIEW

SIDNEY POWELL

MIKE DINOW

CHANEL RION

Transcribed By:
TERRI NESTORE
CSR No. 5614, RPR, CRR

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1 MIKE DINOW: Election day 2020 is marked with an
2 unprecedented uncertainty in the integrity of the voting
3 system and concerns over possible leftist unrest. Here's
4 One America's chief Whitehouse correspondent, Chanel Rion.

5 CHANEL RION: The day of the election, the
6 Whitehouse entered lockdown mode. Just outside where a
7 barrier was being built to protect the Whitehouse from
8 democrat rioters, One America News visited with General
9 Michael Flynn's attorney and author of Licensed to Lie,
10 Sidney Powell. Powell says America is forewarned; the
11 democrats are pulling out all the stops to keep Trump from
12 winning reelection.

13 SIDNEY POWELL: I'm most concerned about the many
14 multifaceted efforts the democrats are making to steal the
15 vote. Everything from suppressing and instilling fear in
16 people from going to the polls, through the whole COVID
17 what I call apocalypse hoax. COVID of course is real but
18 the apocalypse aspect of it is not, and they have
19 developed a computer system to alter votes electronically.

20 People that I know even have not gotten their
21 absentee ballots, they've been canceled, they've had to
22 request them three different times, and been told they
23 were canceled. That's inexplicable.

24 Mail-in votes have gone missing for Trump. There
25 are just any number of ways, and the fact that they are

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1 planning violence is absolutely appalling.

2 CHANEL RION: In a series of leaked videos and
3 documents expose sunrise.com shared Zoom calls of violent
4 leftists mapping out detailed plans to sow chaos in the
5 nation's capital and across the country, should Donald
6 Trump win reelection. Powell urges the president to
7 utilize the full weight of the U.S. military to ensure the
8 city and country is safe.

9 SIDNEY POWELL: There should be no fear of
10 violence from anyone in an election in the United States
11 of America, where our vote is sacred and the right to
12 transfer power peacefully has been around for hundreds of
13 years. This is absolutely ridiculous and appalling, that
14 anyone is contemplating violence that -- I'm just stunned
15 at all the windows being boarded up around Washington,
16 D.C. We shouldn't have to do that.

17 That's unacceptable in this country.

18 CHANEL RION: Sidney, talk to us about the legal
19 aspects of tomorrow. President Trump stated that he's
20 ready and willing and able to walk in with lawyers, day of
21 election. What does that mean and what would a potential
22 legal battle look like?

23 SIDNEY POWELL: Well, that means again that the
24 democrats are using what they call Lawfare to try to alter
25 the results of the election. I think they've effectively

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1 conceded that Trump is going to win at the voting booth,
2 so they're going to pull out every other means they can
3 think of to try to challenge the election, from the way
4 they craft headlines to anything else, to try to make
5 people think there is some doubt about the Trump victory.

6 It's just a repeat, and on steroids, of what they
7 did in 2016 to try to make his whole presidency
8 illegitimate, but it's all their projection, their deceit,
9 their manipulation that's leading to this.

10 CHANEL RION: A lot of preparation's being made
11 right here at the Whitehouse and around it for several
12 kinds of rioters, leftist rioters, including a movement
13 called the Sunrise Movement. Videos came out recently
14 where they have exposed themselves as members of the
15 bureaucracy. They are planning a coup right after this
16 election. What is -- what ramifications do they face, if
17 any, from the legal system?

18 SIDNEY POWELL: Well, they ought to be fired and
19 arrested right now. Certainly fired from their jobs, if
20 they're in the United States government, because we don't
21 allow members of the government to subvert the lawful
22 authority.

23 This president is president until January 20th,
24 regardless of what happens in the election, but we all
25 know from the hundreds of millions of people we see out

1 and around for President Trump that we the people, we the
2 people who ordained and established the Constitution of
3 the United States of America, who believe in that
4 Constitution --

5 CHANEL RION: And with the world watching,
6 America will either exhibit a peaceful transfer of power
7 or a radical show of leftist chaos.

8 Chanel Rion, One America News, Washington.

9 (End of recording.)
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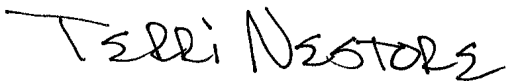
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Dated this 17th day of December, 2020.



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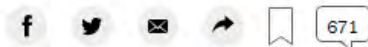


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Overstock C.E.O. Takes Aim at 'Deep State' After Romance With Russian Agent



Maria Butina, who is serving 18 months in prison, and Patrick Byrne, Overstock.com's chief executive, regularly exchanged text messages after meeting at a libertarian conference in 2015. From left: Associated Press and George Frey/Bloomberg

By Michael Corkery

Aug. 15, 2019

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By Michael Corkery

Aug. 15, 2019

They met at a libertarian conference in Las Vegas in July 2015, where they discussed Milton Friedman, Anton Chekhov and John Locke.

He was the philosophizing founder and chief executive of Overstock.com, a publicly traded e-commerce retailer that sells discount furniture and bedding. She was an ambitious graduate student from Russia.

It was the start of a three-year relationship between the e-commerce executive, Patrick Byrne, and the young woman, Maria Butina, that became romantic at times. She is now serving 18 months in prison after being accused by federal prosecutors of trying to infiltrate powerful political circles in the United States at the direction of the Russian government. She ultimately pleaded guilty to a lesser charge.

Mr. Byrne's relationship became widely known on Monday, when his company took the unusual step of issuing a news release that called attention to it. In the release, which was put out in response to a report that Mr. Byrne had been involved in the federal inquiry into the 2016 presidential election, Mr. Byrne said that he had been helping law enforcement agents, whom he referred to as "Men in Black," with their "Clinton Investigation" and "Russia Investigation."

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In an interview late Wednesday, Mr. Byrne said he wanted to shed light on what he saw as problems in the way top law enforcement officials had handled the government's case against Ms. Butina.

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The release, titled "[Overstock.com CEO Comments on Deep State](#)," sent the company's shares plummeting more than 30 percent over the next two days, while opening an intriguing new chapter in the tale of Ms. Butina and her connections to influential Americans. Her lawyer, Robert Driscoll, confirmed that Ms. Butina and Mr. Byrne had been "romantically involved" and that, according to Mr. Byrne, government officials had instructed him on how to interact with her.

In the interview, Mr. Byrne said he was still "quite fond" of Ms. Butina. "Maria should go home and be president of Russia one day," he said. "That is the best thing that could happen to Russia and the U.S."

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Ms. Butina, 30, was sentenced to prison after pleading guilty to failing to register as a foreign agent. [She achieved notoriety by](#) networking with groups like the National Rifle Association, and by posing for pictures with Republicans like Donald Trump Jr. and Scott Walker, the former Wisconsin governor.

For a time, she dated a Republican political operative who had worked on several campaigns. Her lawyer said that she was dating the Republican operative while periodically seeing Mr. Byrne.



BUSINESS Overstock C.E.O. Takes Aim at 'Deep State' After Romance With Russian Agent
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Mr. Byrne, whose father had been the chief executive of the insurance company Geico, has a reputation for speaking his mind with financial analysts and in interviews. He has [criticized reporters](#) personally, some say in an effort to silence criticism. Once, in a conference call with journalists and analysts, he accused Wall Street of running a giant scheme to hurt companies, orchestrated by someone he referred to as the “Sith Lord.” The news release on Monday was particularly colorful and, at times, cryptic.



Maria Butina was sentenced to 18 months in prison after pleading guilty to conspiring to act as a foreign agent, admitting that she was part of a Russian effort to influence



Shadowy Foreign Agent? Hardly. Inside Maria Butina's Prolific Social Media Feed.

Maria Butina was sentenced to 18 months in prison after pleading guilty to conspiring to act as a foreign agent, admitting that she was part of a Russian effort to influence U.S. politics. But she was hardly a shadowy figure. Here's what her online profile revealed. Associated Press

It did not mention Ms. Butina specifically, but instead cited two articles published recently on the website of Sara Carter, a journalist and Fox News contributor. One of the articles detailed his relationship with Ms. Butina. In the news release, Mr. Byrne said that he “confirmed” Ms. Carter’s account.

The relationship, Mr. Byrne said in the interview, began in Las Vegas, where he was giving a talk at the FreedomFest convention, an annual gathering of libertarians.

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Ms. Butina, according to Mr. Byrne, introduced herself and said she wanted to discuss her gun rights group, but he was not interested. She then told a different story: that she was working for a top official at Russia’s central bank and wanted Mr. Byrne to go to Moscow to speak about blockchain technology. Mr. Byrne arranged to meet her for lunch in his hotel suite the next day.

They hit it off, he said, discussing Russian history, literature and philosophy. “She said, ‘You are a very famous man in Russia,’” he recalled.

Still, Mr. Byrne described being somewhat suspicious of Ms.



They hit it off, he said, discussing Russian history, literature and philosophy. “She said, ‘You are a very famous man in Russia,’” he recalled.

Still, Mr. Byrne described being somewhat suspicious of Ms. Butina’s intentions. Eventually, he said, he began to communicate with the F.B.I. about their interactions. Mr. Driscoll, Ms. Butina’s lawyer, said that Mr. Byrne had contacted him after she was sentenced to prison in April and had told him that he had spoken periodically to the F.B.I. about Ms. Butina. An F.B.I. spokeswoman declined to comment.

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After the convention, Mr. Byrne and Ms. Butina kept in touch through text messages. She told him that she wanted him to meet her in Paris, Rome or Montenegro. They finally decided to meet at the Bowery Hotel in New York in September 2015. Mr. Byrne, who calls himself a “56-year-old bachelor,” said that the rendezvous in New York quickly became romantic. They met several more times in different cities around the United States, and she visited him at his home in Utah.

“I think she admired him, but I don’t think she was looking to settle down,” Mr. Driscoll said.

During the visits, Mr. Byrne said, Ms. Butina spoke increasingly about meeting or seeking to meet people involved in the presidential campaigns of Hillary Clinton, Mr. Trump, Senator Ted Cruz of Texas and Senator Marco Rubio of Florida, which made Mr. Byrne wary. Her lawyer said that she was merely an ambitious person hoping to advance her career by improving relations

about meeting or seeking to meet people involved in the presidential campaigns of Hillary Clinton, Mr. Trump, Senator Ted Cruz of Texas and Senator Marco Rubio of Florida, which made Mr. Byrne wary. Her lawyer said that she was merely an ambitious person hoping to advance her career by improving relations between the United States and Russia.

Mr. Byrne has recently been focused on developing [a blockchain business called tZero](#), which he describes as the place where “blockchain meets capital markets.” Overstock is based in Midvale, Utah, and until this week its stock had been soaring. On Thursday, the company’s share price rallied to rise more than 16 percent, erasing many of the recent losses.

In the news release on Monday, Mr. Byrne said he had previously worked with law enforcement authorities in a case involving a friend who was murdered and also as part of a “shake up” of Wall Street a decade ago.

Mr. Byrne said he was motivated to come forward in recent weeks because he believed that top law enforcement officials had not handled the investigation into Ms. Butina properly. In the company’s news release, he said that the investigation was “less about law enforcement and more about political espionage conducted against Hillary Clinton and Donald Trump.”

Citing Mr. Byrne’s concerns, Mr. Driscoll wrote a letter to the Justice Department’s inspector general and office of professional responsibility on July 25, saying the Overstock executive had told him that during his relationship with Ms. Butina, he had “acted at the direction of the government and federal agents by, at their instruction, kindling a romantic relationship with her.”

Mr. Driscoll urged Justice Department officials to examine Mr. Byrne’s concerns further.

“As an adjunct professor and C.E.O. of a public company, Mr. Byrne is a credible source of information, who from my view has little to gain, but much to lose by disclosing a sporadic relationship with Maria,” he wrote. “His claims are worthy of investigation.”

A version of this article appears in print on Aug. 16, 2019, Section B, Page 1 of the New York edition with the headline: A Tycoon, a Russian Lover And ‘Deep State’ Intrigue. [Order Reprints](#) | [Today’s Paper](#) | [Subscribe](#)

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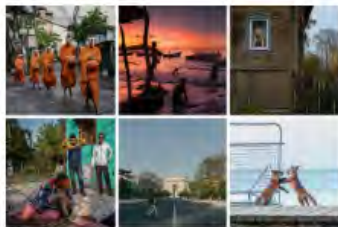
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File:

Dr. Corsi NEWS 12-24-20:

Patrick Byrne Explains Trump Path To Victory

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1 CRAIG: So, Dr. Corsi, it looks like it's
2 boiling down to President Trump against the world;
3 is that where we're at?

4 DR. CORSI: That's it. And then the odds
5 are looking good to me for Donald Trump to win.
6 It look -- it doesn't need anything more than
7 Donald Trump versus the world. I think it's
8 always been Donald Trump versus the world.

9 I -- I can remember when he bought the --
10 the land from Bonwit Teller, that he was going to
11 put up the Trump Tower, and all these people in
12 New York wanted to preserve these art deco
13 sculptures; Donald Trump got a wrecking ball and
14 he knocked the thing down before they could
15 preserve it. Yes, it wasn't much to preserve
16 after he got done with it, and he built Trump
17 Tower.

18 Donald Trump doesn't need approval, and he
19 will win.

20 Today is December 24th, this is 2020,
21 Christmas Eve; our Lord Jesus Christ, we're going
22 to celebrate his birthday. And the same kind of a
23 constellation it appears with the three stars, is
24 coming back again. And I want to make only one
25 kind of -- two -- one -- two comments this

1 morning, because I want to get right into --
2 Patrick Byrne is going to join us here. He's
3 waiting right now, and I don't want to keep -- get
4 too long into the introduction, but two points.

5 Number one: In terms of Jesus Christ, you
6 know the Romans really thought they won when they
7 crucified him and put him in the tomb, three days
8 later he rose. I guess Jesus Christ won that one.

9 What do you think, Craig?

10 CRAIG: Right, absolutely. And he's coming
11 back soon. We don't know when, but my preference
12 would be four more years for Trump, and then we'll
13 worry about that later.

14 DR. CORSI: Well, Jesus Christ will come
15 back when he wants to and --

16 CRAIG: Right.

17 DR. CORSI: -- we'll be -- welcome him, and
18 -- but the point is, often it looks like defeat is
19 certain until victory happens.

20 And I can point -- George Washington went
21 through the same thing, and never gave up despite
22 all the setbacks. Abraham Lincoln had many dark
23 days in the White House. And Donald Trump has
24 been looking at the presidents of Abraham Lincoln,
25 and then also Winston Churchill, all of whom went

1 through dire events and won. Yeah, it -- Winston
2 Churchill, they're bombing London, he says: This
3 is our finest hour.

4 You look around and say: Wait a minute,
5 how could that be possibly true? It was. And
6 again, the courage and the determination in these
7 darkest hours is what -- what makes greatness.
8 And Donald Trump is capable and -- and has
9 experienced greatness throughout his life.

10 Number two: We're very close in a lot of
11 these states to getting a decertification of
12 Biden. I'm pointing to Wisconsin, and we have the
13 Supreme Court decision, and there's a process
14 ongoing. We're right now beginning to look at the
15 -- those ballots that need to be excluded, and
16 there's over -- there were 240,000 of them; and so
17 I think that process is going along.

18 And one of these states, whether it's
19 Georgia or Arizona, one of these states or
20 Wisconsin will start the process by decertifying
21 Biden. And when one state does that, it's going
22 to be an avalanche.

23 So I remain confident today that we should
24 celebrate Christmas, because this is our great
25 time of the year for Christians to celebrate. And

1 I believe we will have the assistance of Jesus
2 Christ, if we pray through this time, for the
3 Republican for Donald Trump.

4 We have also join- -- joining us today is
5 Agent X will be here.

6 And Patrick -- let's bring Patrick on.

7 Patrick, it's great to have you here. It's
8 a great honor to have you, and thank you --

9 Patrick Byrne: Dr. Corsi --

10 DR. CORSI: -- for joining us.

11 Patrick Byrne: Dr. Corsi, the honor is
12 definitely mine. I've admired you since that
13 first time I saw you on television; you reminded
14 me of Thomas Moore, I suppose, where you just gave
15 this very simple explanation that said you weren't
16 going to -- to swear something -- to something
17 against the President that wasn't true, because
18 you -- you just don't do that.

19 And I thought, wow, finally a man who
20 thinks in terms of principles and not in terms of
21 expediency.

22 DR. CORSI: And, again, the -- the pressure
23 was enormous. I mean, it -- they were going to
24 put me in prison for 25 years. The same thing
25 they're saying now -- Chinese are saying they want

1 to go after Donald Trump for war crimes. I mean,
2 everybody wants -- I -- I felt like, you know,
3 there's nothing anybody can do to me here; this is
4 not -- I'm not here for an earthly reward.

5 PATRICK BYRNE: Yeah.

6 DR. CORSI: And -- none of us are here
7 permanently; you might as well face that reality.
8 You know, nothing -- there's nothing you can do to
9 make it out of here alive. You know, that's a
10 fundamental reality.

11 PATRICK BYRNE: Right. I -- you don't have
12 to -- in a sense -- so you know I've had a few
13 medical issues in my life --

14 DR. CORSI: Yes.

15 PATRICK BYRNE: -- and I -- I got to that
16 point a long time ago. I got to that point a long
17 time ago.

18 DR. CORSI: Every day is a gift.

19 PATRICK BYRNE: Every day is -- that's why
20 they call it the present.

21 DR. CORSI: And we have to live in the
22 present, and in any moment everything can change,
23 and one phone call, one e-mail, one -- somebody
24 doing something positive. I mean, my wife woke up
25 in the middle of this -- just one morning, she

1 just woke -- woke up and sat up in bed and said --
2 I was sitting in the chair in the -- in the
3 bedroom working on the computer, trying to figure
4 out how he's going to deal with Mueller, and she
5 said: I would rather visit you in prison the rest
6 of your life than have you not be the man I
7 married.

8 PATRICK BYRNE: That's the woman -- you
9 married the right gal.

10 DR. CORSI: I sure did. Monica's been with
11 me now -- this will be our 29th year. We're going
12 into our 30th year of marriage. We'll celebrate
13 that in August. And it's been the best 30 years
14 of my life.

15 PATRICK BYRNE: Me, I can't find the one
16 that will have me, Dr. Corsi. I must do something
17 wrong.

18 DR. CORSI: We'll give you the formula,
19 just keep looking, is what -- a -- a good one, and
20 you'll find them, if you --

21 PATRICK BYRNE: Not many shopping days left
22 until Christmas.

23 DR. CORSI: See, don't count it out. You
24 know, I've seen 70-year-olds and 80-year-olds and
25 90-year-olds still thinking about the future. We

1 got to keep thinking about the future.

2 And Agent X, how are you doing today?

3 AGENT X: I'm doing great.

4 DR. CORSI: Great. And we -- Patrick, I

5 want to start right with what -- what -- you had

6 this extraordinary meeting in the White House, I

7 guess last weekend, and what -- I've been wanting

8 to ask you -- I mean, how did you get there? I

9 mean, you -- you come from nowhere in this saga,

10 you have -- you know, have done great in business,

11 everybody knows you from business. But -- I mean,

12 you've had associations with Warren Buffett, as I

13 understand, and -- you know, you haven't been on

14 the political scene, and then suddenly you're at

15 the White House in this critical historic meeting,

16 I got to say, how'd you get there?

17 PATRICK BYRNE: Well, it -- it was -- so

18 first it's -- it's etiquette, of course, when you

19 meet with the President and go in the White House;

20 of course, you never reveal anything about the

21 meeting. But given that one of the weasels in the

22 meeting leaked about it afterwards and lied about

23 it, I felt it was incumbent upon me to tell the

24 truth.

25 Secondly, I never met Donald Trump. I did

1 not support Donald Trump. I'm a small-L
2 libertarian, Milton Friedman is my -- was my
3 friend and teacher. And -- and I'm a small-L
4 libertarian; so I've just always voted libertarian
5 all my life.

6 Third, how I got there, it was a bit of a
7 Jedi-mind trick, but when you got Sidney Powell
8 and Michael Flynn with you, it just sort of --
9 there was no scheduled meeting, he didn't know we
10 were coming, is the short answer; but we sort of
11 -- you know, it's you fake it until you make it,
12 as they say.

13 DR. CORSI: Well -- I mean, Milton Friedman
14 -- I never met him, but I -- when I was going
15 through graduate school, he was at the University
16 of Chicago, and he was a monetary policy guy who
17 wanted us to focus on federal reserve and how --
18 the growth of the money supply. I thought he was
19 brilliant in this era --

20 PATRICK BYRNE: He was.

21 DR. CORSI: -- where the Kenyan -- Ken- --
22 the Keynes and Keynesians were saying just spend,
23 spend, spend, and surplus spending, and that's the
24 kind of thing which got us where we are today. I
25 think if Milton Friedman had been alive today,

1 we've been -- we would have -- I greatly admired
2 Milton Friedman when I was going through graduate
3 school.

4 PATRICK BYRNE: Well, he was a great friend
5 of mine. And I'll tell you something -- I'll tell
6 you a story, it's public, in -- in limited circles
7 it's public; it's a story that only -- about .1
8 percent of humanity would -- it would mean
9 anything to you, but I have the feeling that it
10 sounds like you, and probably some of your
11 audience it would mean something.

12 You know -- well, the -- and that is that
13 his foundation was set up so that when he passed,
14 his foundation, which was the -- sort of a --
15 origin of the movement for School Choice, the
16 Milton and Rose Friedman Foundation, when he
17 passed it was set -- it was going to dissolve.
18 And he called me a few weeks before he passed and
19 he told me that I know -- I know -- sorry -- I
20 know the end is near and I want to make a change;
21 Rose and I want to make a change in our will, and
22 we want you to be -- succeed me as chairman and
23 carry on in my name for 10 years.

24 So I carried on as the chairman of the
25 Milton and Rose Friedman Foundation for 10 years,

1 which to me was like Isaac Newton had called me up
2 and said, you know, take my name for 10 years.
3 Like I say, I know that that -- you know, for 99.9
4 percent of humanity, that doesn't boil an egg; but
5 for a small group of people, that actually means
6 something.

7 DR. CORSI: Well, it means a lot to me and
8 it tells me really who you are, because Milton
9 Friedman was brilliant, a contrarian; he had very
10 few people in the mainstream economics, these
11 years were coming out of Roosevelt where we did
12 all this deficit spending for -- not only his --
13 his programs in the depression, but then World War
14 II, and then following that in the '60s when
15 Johnson, after Jack Kennedy was assassinated, had
16 all this new deal programs and he was spending
17 like crazy and saying: Don't worry about it.

18 And today we've got -- you know, we're
19 approaching doubling the national debt, and the
20 federal reserve is buying our debt in massive
21 numbers, and Milton Friedman would have been
22 apoplectic watching this.

23 But anybody who was a fan of Milton
24 Friedman, I'm a fan of. And so --

25 PATRICK BYRNE: You know, he -- George

1 Schultz was asked once, you know, who was the most
2 important man he ever met; and he said, of all the
3 -- I get (inaudible) when I tell this story, but
4 he said of all the presidents and dictators and
5 kings and foreign ministers I ever met, the most
6 significant man I ever met was an academic
7 scribbler from Chicago named Milton Friedman.

8 DR. CORSI: I know.

9 PATRICK BYRNE: A great friend of Liberty
10 that -- from one of the greatest friends of
11 Liberty in the 20th Century. I put him and
12 Churchill, and maybe George C. Marshall, as the --
13 my (inaudible).

14 DR. CORSI: Okay. So I think we're getting
15 an understanding of who you are, because to me
16 these are -- the heroes I have are the people who
17 are contrarians, who have different insight or can
18 perceive things differently so that a Churchill or
19 a -- a Lincoln, you know, could still see victory
20 in -- in the midst of the worst Civil War when it
21 looked the -- the darkest days.

22 And, you know, 1864 Lincoln had his cabinet
23 sign a blind note and they said he -- he had them
24 sign a note that they didn't read saying they
25 would support his successor, because he was sure

1 he was going to lose. And then Sherman wins,
2 takes Atlanta --

3 PATRICK BYRNE: Uh-huh.

4 DR. CORSI: -- finally, and that's the --
5 that's the catalyst for Lincoln to get his second
6 term. And we're going to have so- -- that's going
7 to happen, I think again here.

8 Now, Patrick, as I understand it --

9 PATRICK BYRNE: Before you go on, may I
10 bring something up? I've been spending a lot of
11 time with General Flynn.

12 DR. CORSI: Good.

13 PATRICK BYRNE: Mike Flynn, the people's
14 general, and he's told me about, and reminded me
15 of, and I went and read it, Sherman's letter was
16 on Christmas Eve the night before he took Atlanta,
17 and he wrote -- you know that -- like you're
18 nodding like you know that letter --

19 DR. CORSI: I know -- go ahead and explain,
20 I know the letter. Go ahead.

21 PATRICK BYRNE: Well, he was about to take
22 Atlanta and he sent the town fathers, so to speak,
23 a letter that said, you know, don't put your city
24 through what is going to happen. But it really
25 defines the American way of war. He said: Let

1 your people go, let everybody leave, I will give
2 them safe conduct; but if you don't, I'm going to
3 burn this to the ground.

4 DR. CORSI: Yeah.

5 PATRICK BYRNE: As -- I'm going to burn it
6 -- because it was a munition center. It was a
7 great big factory for the south, and they didn't,
8 and he went in and he burned the city to the
9 ground.

10 DR. CORSI: And Flynn tells you this story
11 when --

12 PATRICK BYRNE: Yeah.

13 DR. CORSI: -- and he -- he's telling you,
14 basically, that a guy like Sherman did have a
15 heart and so did Lincoln.

16 PATRICK BYRNE: A gentlemanly way to fight,
17 and had a way -- and he -- it's a -- it's an
18 amazing letter from U.S. history.

19 DR. CORSI: I want to ask --

20 PATRICK BYRNE: I don't know --

21 DR. CORSI: I --

22 PATRICK BYRNE: -- letter to Atlanta and it
23 was Christmas Eve from -- what, 36 -- 156 years
24 ago.

25 DR. CORSI: Yeah. And that -- see, this is

1 what people don't understand in terms of how
2 history is shaped; when you go back and think
3 about -- you know, what was Lincoln thinking?
4 Lincoln was faced with that he could be defeated
5 by General MacCallum, he was running against him.
6 The General he promoted twice and could not really
7 follow up and fight a battle. I mean, Lincoln was
8 on the battlefield of Antietam, and he said, you
9 know, what -- what do you see stretched to your
10 tent, and he was there with a congressman, and he
11 slept that night, he woke up in the morning and
12 said: What do you see here? He said: Well, Mr.
13 President, that's the army of the Potomac. He
14 said: No, it's General McCallum's personal
15 bodyguard. You know --

16 PATRICK BYRNE: Yeah.

17 DR. CORSI: -- and it -- it looked dark as
18 -- again, General Flynn is another American hero,
19 and I want to get to that in a minute, but it
20 sounds like you and -- were hanging out with
21 Sidney Powell and General Flynn, and you got an
22 opportunity to go to the White House. And since
23 you were there, you came along, and then you find
24 yourself sitting in the Oval Office, and there's
25 the President of the United States --

1 PATRICK BYRNE: No, we went with an idea of
2 sort of penetrating to the Oval Office, because
3 the President is getting bad advice and we decided
4 it wasn't quite right and --

5 DR. CORSI: You went in to change things --

6 PATRICK BYRNE: I'm not going to go into
7 too much of the detail of what had -- because I
8 don't want to get any secret service agents in
9 trouble, but we -- and -- but we sort of -- kind
10 of Jedi-mind tricked our way through where we
11 needed to get. And then we got to this, and --
12 and then we hid in an office for 20 minutes, and
13 then we got to this other; and we worked our way
14 closer to the Oval Office. We just got in. It
15 was a --

16 DR. CORSI: Good for you.

17 PATRICK BYRNE: Before you knew it, we're
18 next to the Oval Office and -- and we walked into
19 the Oval Office as -- as we heard the President
20 coming in, and suddenly it was the three of -- the
21 four of us. There was another -- another lawyer
22 with us, one of Sidney's lawyers, I doubt that
23 woman wants -- I don't know if she wants her name
24 used, so I'm not going to include her.

25 DR. CORSI: Okay. And so the conversation

1 gets started, and you get into the room; what's
2 one of the first things you say to the President?

3 PATRICK BYRNE: Well, Sidney and General
4 Flynn did most of the talking for the first 10 or
5 15 minutes. Also about 15 minutes into it his
6 lawyers showed up, three lawyers came in, and they
7 were very upset, and it included White House
8 General Counsel Pat Cipollone -- Cipollone -- I
9 keep getting corrected, however I -- Cipollone
10 would be the Italian, but I'm not sure how it's
11 pronounced by Americans -- and they came in quite
12 huffing and puffing about what was going on. And
13 it turned into -- it was a four-hour -- four
14 and-a-half hour, four-hour 40-minute meeting that
15 was conducted about -- most -- about half of it
16 there and then a little bit in the cabinet room
17 when Rudy came in; and then we all ended up
18 together in the -- in the residence. There's sort
19 of a second Oval Office they call the Yellow Oval,
20 I think, or the -- the President served delicious
21 Swedish meatballs. Compliments to the White House
22 chefs. They -- they were really quite good.

23 And we had -- and we sat around and -- and
24 talked some more until about 12:10 in the morning.
25 President Trump said after -- when we left the

1 part of the two hours in the Oval Office, which
2 almost came to blows -- pretty damn close came --
3 if they -- if it had been one inch pushed further,
4 there would have been a -- a -- official -- at
5 least a slap thrown -- a bitch slap -- pardon me
6 but I would have thrown a bitch slap on this
7 lawyer, the lawyers were tremendously
8 disrespectful to Donald Trump.

9 I want anyone to know -- and forget the
10 personal disrespect and which -- by showing
11 disrespect to the President, they're showing it to
12 the United States, you do not talk to the
13 President that way; they were also lying to him.
14 Pat Cipollone was lying through his teeth, and he
15 got caught lying through his teeth.

16 And I eventually said: Mr. President, I
17 can get three young men from your administration
18 in here in 30 minutes who can explain to you --
19 well, I -- I actually said that you're -- who can
20 explain to you they're getting signals from their
21 leaders that -- just get the President to concede;
22 we're just going to get him into transition mode,
23 just help us get him to concede.

24 The leaders in the White House led by Pat
25 Cipollone and more recently Mark Meadows, were

1 telling people in the White House -- half the
2 white House -- they're so discouraged, I spent two
3 months swimming around the outside of this
4 administration, but getting to know people and
5 such, and the message I'm constantly getting is
6 people within love him, the young people, but the
7 -- the leadership is trying to get the young
8 people to get the President -- not to support him,
9 not to care as others, not to get to the -- and
10 just to get him to concede.

11 It was disgusting. And when we were all in
12 front of him, within about 15 minutes it became
13 clear what they were doing, they are deny- -- and
14 anything that gets discussed, the lawyers are
15 immediately in the mode of: No, no; oh, you can't
16 do that. No, no; you can't do that. No, you
17 can't do that one either. No, you can't do that.

18 And Sidney was there and saying: What do
19 you mean you can't do that? Of course he can do
20 that; he's got this power and that -- no, no, no,
21 you can't -- and they got caught so many times --
22 finally Flynn and I turned to each other and said:
23 This is surreal what we're watching.

24 And at one point Cipollone started not just
25 yelling at me, which I don't care about, or Flynn

1 or Sidney and being awful -- first of all, they're
2 sexist assholes. If you -- the way they treated
3 Sidney and the young female lawyer who was with
4 Sidney, if you did that in corporate America
5 today, you would have a class-action lawsuit in a
6 New York minute. So they're sexist assholes.

7 Setting that aside, they -- they were so
8 angry they started yelling at the President. And
9 I couldn't believe it. And -- and I finally --
10 well, one of them -- Pat Cipollone was yelling at
11 the President. And at one point he yelled: Is --
12 he yelled: Well, you don't even -- if you really
13 want to do this, you don't even need -- you can --
14 you can just declare that Sidney Powell is your --
15 is a White House counsel -- and she is.

16 And -- and about 20 minutes later of more
17 shouting -- and by the way, Mr. Trump turns out to
18 be a much different man than I had ever understood
19 through the mass media -- stupid -- stupid
20 (inaudible) may not to get that they -- he's
21 actually a very gentle and kind and warm guy, way
22 too patient. There's not a -- he's way too
23 patient.

24 I finally said to him: Sir, CEO to CEO,
25 I've never -- I -- you know, you got to get rid of

1 these guys right now, they're lying to you. I
2 said it: I can get three -- I can get young
3 people from your administration to come in right
4 now -- well, in the next 30 minutes who will tell
5 you these men are sending the word down get -- do
6 not help the President, get him to concede --
7 blah, blah, blah.

8 So, finally, Mr. Trump said: You know
9 what, Pat -- and I -- I don't want to repeat too
10 much of what Mr. Trump said, because that's not --
11 but --

12 DR. CORSI: It's -- it's okay. I -- Pat, I
13 -- I know there's certain rules and regulations
14 and -- and etiquette about that; but what --
15 what's -- what's critical right now is you -- you
16 heard a meeting and saw President Trump up close,
17 and he's going to go down. So let's forget --
18 he's not going to go down, but because all of us
19 are restrained -- I want you just to tell us what
20 he said, and -- and so they get mad at you, what
21 are they going to do? It's not -- it's not a
22 crime to say what he said.

23 PATRICK BYRNE: Yeah.

24 DR. CORSI: I -- so what did he -- what did
25 he say?

1 PATRICK BYRNE: He said -- after a while he
2 said: You know, Pat -- well, he said: You folks
3 have -- he said: You've -- you know, these people
4 at least want to fight for me.

5 He turned to me at one point and said: Do
6 you see what I've been putting up with for four
7 years? I've had the best -- all my life, I've had
8 the best voice. People call me -- me from all
9 over the world to ask me: What lawyers should I
10 use on this? What should I use on that? I've
11 been in this job for four years, can you imagine
12 what I could have gotten done without these -- if
13 I didn't have to work through the -- people like
14 this; do you see what I have to put up with?

15 And then he turned to Pat and he said: You
16 know what, you're -- you're -- these folks are at
17 least ready to fight for me, you're not; I hereby
18 declare Sidney counsel -- as Sidney Powell as
19 White House special counsel. And then one of the
20 lawyers started saying: Well, you know, it takes
21 a month to get the -- the -- the security
22 clearance and this, that, and the other thing.
23 And General Flynn said: That's not true; you have
24 the right, right now, to declare, Mr. President,
25 that she has a top-secret security -- security

1 clearance.

2 And he says: You know what, Sidney Powell
3 now has a top-secret sec- -- security clearance.
4 They -- oh, and the next day when Sidney Powell
5 called in, Mark Meadows -- and this all happened
6 -- Mark Meadows was on the phone for that part,
7 when he called in Mark Mead- -- when she called
8 the next Saturday morning and said: Well, Chief
9 of Staff Meadows, it looks like I'm going to need
10 an office in the White House. And -- and Meadows
11 said: Sidney, I'm not sure we can really do that
12 for you.

13 And she said: Well, okay, then you need to
14 get me a badge so I can come and go. And Meadows
15 said: Well, I -- you know, we'll have to check
16 into that, but I'm not sure we can get that for
17 you either.

18 I will tell you that there was a point that
19 General Flynn -- because these goon lawyers were
20 standing up and acting intimidating, General Flynn
21 got to his feet -- and he's a wonderful gentleman,
22 calm, measured-fashion, he said: Can we just
23 start with a common baseline, you -- you folks?
24 You do agree that on November 3rd he won the
25 election; you do see that he won, don't you? And

1 let's start there.

2 And the three lawyers looked down and
3 kicked the dirt and looked around: Well, we --
4 wouldn't answer that question, which is when --
5 which is when -- that's actually when President
6 Trump said: Hey, it's -- you know, I -- I've --
7 you -- you folks aren't even fighting for me;
8 these folks at least want to fight.

9 And he tried to do that thing with Sidney
10 Powell, and he did it. He did it. It was done.
11 It was done. And the next morning Mark Meadows
12 refused to carry out that instruction, and all the
13 goons went to work and -- went to work and before
14 you knew it by -- by Monday night or Tuesday, it
15 was off the table. So --

16 DR. CORSI: Was -- what happens in these --
17 what you're telling us here is that as soon as you
18 guys left, then they --

19 PATRICK BYRNE: Yeah.

20 DR. CORSI: -- then the naysayers Cipollone
21 and Meadows, and all these guys, came back in and
22 said: Now, Mr. President, I know that you had
23 this meeting, but you're a little insane there;
24 why don't you get back in line and why don't you
25 do what we tell you to? And --

1 PATRICK BYRNE: I think -- yeah, the gist
2 -- yeah, they can slow (inaudible) -- they refused
3 to carry out orders. I don't want to include
4 Mr. Meadows in the same group. Mr. Meadows is not
5 venal. Mr. Meadows is weak. He's a congressman.
6 He's a lovely guy. He should go be an ambassador
7 somewhere, not to -- like, you know, like Italy or
8 something.

9 He's not the -- he's not a man of courage
10 and -- but he's not venal. The -- the lawyer Pat
11 Cipollone -- I got to tell you, it -- all these
12 guys -- well, one of the three was actually on his
13 way out, that was his last day. And
14 Mr. Trump -- I don't -- don't want to tell you his
15 name, but President Trump said: You know, this --
16 can you believe this fellow? This is his last
17 day, because he's going -- he's starting a new job
18 on Monday at 10 times the salary I'm paying him.
19 All these people are being told if you just get
20 the prep by the Washington establishment, if you
21 get the President to concede, you -- there's a
22 nice cushy job waiting for you over at --

23 DR. CORSI: We got a million dollar salary
24 for you over here at XYZ firm, why don't --

25 PATRICK BYRNE: Oh, yes.

1 DR. CORSI: -- you just get him -- yeah.

2 PATRICK BYRNE: You're going to see them

3 get million and-a-half/two million dollar salaries

4 --

5 DR. CORSI: Right.

6 PATRICK BYRNE: -- and there will be

7 invitations for you to join Ball (inaudible), and

8 the right social circles, and all this stuff --

9 DR. CORSI: Your life is going to be made,

10 just get rid of Trump.

11 PATRICK BYRNE: And if you don't -- if you

12 don't, you're a pariah.

13 DR. CORSI: If you don't the --

14 PATRICK BYRNE: If you don't --

15 DR. CORSI: If you support Trump and give

16 him good advice, we're going to destroy your

17 career --

18 PATRICK BYRNE: Yeah.

19 DR. CORSI: -- which would you rather

20 have?

21 PATRICK BYRNE: I (inaudible) -- if -- if

22 -- God forbid, these guys -- you -- if -- if

23 President Trump -- well, if -- if this doesn't

24 work out, I bet you see these guys get jobs for a

25 million and-a-half/two million dollar salaries

1 within 60 days of -- by -- by the end of March.

2 DR. CORSI: And they'll do nothing when the
3 communist Chinese come after Donald Trump to put
4 him in prison or kill him for war crimes, they'll
5 cooperate with communist China, because communist
6 China will pay them more.

7 PATRICK BYRNE: Who said -- no, you said --
8 you opened saying something about the Chinese,
9 you're saying Trump -- they're going to prosecute
10 Trump as a criminal --

11 DR. CORSI: Yeah --

12 PATRICK BYRNE: -- a war criminal --

13 DR. CORSI: War criminal.

14 PATRICK BYRNE: Yeah. Well, at least he
15 doesn't harvest organs.

16 DR. CORSI: Well, look, Patrick, we've got
17 to take this -- this is -- I mean, first -- first
18 of all, I know Donald Trump. Now, Donald Trump
19 had to in one of these -- what -- what -- you
20 know, going through this, listening to these
21 guys -- and by the way, it's -- it's no longer
22 time to play Hamlet, you know, to be, not to be,
23 what should I do, maybe I should do this -- it's
24 time for some decisive action.

25 PATRICK BYRNE: I --

1 DR. CORSI: And --

2 PATRICK BYRNE: -- I have to say that's --

3 if I had one way to -- he was too nice. He's too

4 nice. And he was a bit Hamlet-like. He knows

5 what the right thing to do is. He knows what the

6 right thing to do is --

7 DR. CORSI: Well --

8 PATRICK BYRNE: -- but he's too nice. He

9 should have --

10 DR. CORSI: I'm pretty sure --

11 PATRICK BYRNE: -- fired them lawyers on

12 the spot. I just about -- I literally -- the one

13 lawyer was being so disrespectful I was on the --

14 well, there was a point that when they sort of

15 crowded Flynn, I jumped up and Flynn and I were

16 shoulder apart -- I mean, Flynn, Byrne, a couple

17 -- a mix, you know? But we were shoulder to

18 shoulder --

19 DR. CORSI: Right.

20 PATRICK BYRNE: -- with the lawyers, I had

21 already set my trigger point if that lawyer leaned

22 his face one inch closer I was going to throw --

23 not a right hook, but a bitch slap on him. He was

24 so disrespectful the way he talked to Flynn and

25 the way he talked to the President.

1 DR. CORSI: Because he -- and -- and what
2 they -- they come in and say: You know,
3 Mr. President, you don't understand, you can't do
4 this and we're going -- you're going to be -- make
5 him feel terrible.

6 PATRICK BYRNE: Yes.

7 DR. CORSI: Now, I've seen that -- let me
8 give you a picture of Donald Trump as I've seen
9 him. So here we are, I'm VIP guest in the hotel.
10 I mean, I've been there -- you know, I had a
11 stretched limousine parked outside, and Donald
12 Trump -- I had my table in the Edwardian Room
13 where I had breakfast every morning.

14 Well, here's Donald Trump, he's got his
15 family over here, and I come over and say hello to
16 him. And we know each other and say hello. Well,
17 he's the most gracious guy in the world.

18 PATRICK BYRNE: He really is.

19 DR. CORSI: And he'll tip the -- he -- he
20 makes sure everybody has money coming out, he
21 tipped these people like I was tipping them. You
22 know, I go out to -- in the morning, get my -- in
23 my limousine, I hand the doorman 20 bucks: Here
24 you are. I didn't want him to do anything, just
25 thank you for being here.

1 PATRICK BYRNE: Right.

2 DR. CORSI: Okay. And know that this is a
3 guy who makes the place work. That's how Donald
4 Trump thinks.

5 PATRICK BYRNE: Right.

6 DR. CORSI: Now, when you think that way --

7 PATRICK BYRNE: He's really --

8 DR. CORSI: You're a CEO, you -- you know
9 how it is.

10 PATRICK BYRNE: You know, it's just who
11 makes the place work. That's well said. You
12 know, it's just who makes the place work.

13 DR. CORSI: Okay. Now, he's got to
14 understand these lawyers are -- are not making the
15 place work, what they're going to do is --

16 PATRICK BYRNE: No, they're making the
17 place not work. They're making the place gummed
18 up, because that way they're going to be accepted
19 in the right socialite circles and -- in New York,
20 and when they go to the Met, people are going to
21 say: Oh, you helped get us rid -- rid of that
22 horrible man.

23 DR. CORSI: Yeah. Orange man bad.

24 PATRICK BYRNE: I grew up around that
25 circles. It's -- it's -- it's -- I -- I -- I

1 think of it as slumming. I grew up around people

2 like that, and you aren't missing a thing. And

3 it's slumming. And they're so -- so there.

4 DR. CORSI: Okay.

5 AGENT X: (Inaudible) --

6 DR. CORSI: Yeah go ahead, Agent X.

7 AGENT X: So did he -- did -- did he

8 appoint Sidney Powell special counsel and give her

9 the security clearance she needs?

10 PATRICK BYRNE: He did verbally, but over

11 the weekend his staff undermined it and sabotaged

12 it, and this and that, and it didn't get done.

13 And it has not --

14 DR. CORSI: Well, I'll -- I'll tell you

15 what they do, they put all kinds of trash out

16 about her.

17 PATRICK BYRNE: Yeah, they put all of this

18 --

19 DR. CORSI: When --

20 PATRICK BYRNE: -- me -- the -- the -- the

21 general counsel went out and spun a bunch of lies

22 about the meeting to his pet journalist Maggie

23 Haberman in the New York Times. Pat Cipollone is

24 a -- is a leaker to Maggie Haberman of the New

25 York Times, and he put out some lies about the

1 meeting and that it was about martial law and
2 Insurrection Act, and this and that. Those are
3 fabrications. Not one word --

4 DR. CORSI: Did it discussed at all -- did
5 anything come up about martial law at all this
6 time?

7 PATRICK BYRNE: Not one word. Not one
8 word. Not -- no, the Insurrection Act was not
9 mentioned, martial law was never --

10 DR. CORSI: Mag- -- Maggie Haberman makes
11 it her biggest story of the day coming out of
12 there.

13 PATRICK BYRNE: Yeah, it's a fabrication.
14 It's a fabrication. And based on the typical
15 unnamed sources that we can't name in the Oval
16 Office -- well, here you have a name source, his
17 name is Patrick Byrne, he was there. I was there.
18 I posted a picture of me in the White House, which
19 is also something you don't do, but you have a
20 named source who was in the meeting, who's saying
21 that's a flat lie. Maggie Haberman had printed a
22 fabrication. The New York Times printed a
23 fabrication.

24 DR. CORSI: And Mark Meadows did nothing to
25 correct it. He said -- did nothing to say that

1 was wrong. He was happy to have the --

2 PATRICK BYRNE: Oh, I say he's a weak man.

3 He's a weak man. He's not venal. He's a go-along

4 guy. He's probably -- I bet you he's got a

5 million dollar salary waiting for him at some

6 lobbying firm, and I bet you Patrick Cipollone has

7 got a million-and-a-half dollar salary at some --

8 at Sullivan & Cromwell, or something like that.

9 DR. CORSI: He'll be -- he'll be the toast

10 of the town. They'll -- they'll celebrate him in

11 the restaurant. So -- you know, everywhere he

12 goes, you come to the Kennedy Center, they'll

13 stand up and applaud for him.

14 PATRICK BYRNE: But if Trump fights on --

15 DR. CORSI: He's going to --

16 PATRICK BYRNE: -- that's all gone. That's

17 all off the table. That's how it works. Right?

18 DR. CORSI: Well, these people -- if these

19 people control it -- you know, they think it's

20 going to be all fine, they'll bring Biden in; they

21 -- they don't understand they'll be one of the

22 first to go. You know, this is basically --

23 PATRICK BYRNE: They'll be the first

24 against the wall when the revolution comes. You

25 know, what if -- I can tell you something Donald

1 Trump could do that I -- in my mind, would give
2 him like 100 percent chance of victory, he could
3 do it in two minutes, it would be make -- make
4 Michael Flynn his general coun- -- his -- make
5 Michael Flynn his Chief of Staff --

6 DR. CORSI: Chief of Staff. Yeah, make him
7 Chief --

8 PATRICK BYRNE: Sidney Powell either the
9 White House General Counsel or the Attorney
10 General, the acting --

11 DR. CORSI: Yeah --

12 PATRICK BYRNE: -- Attorney General --

13 DR. CORSI: I mean, at least get your
14 friends around you and the people who want to work
15 for you. Let's get the people in there who will
16 be giving you advice to win, not the --

17 PATRICK BYRNE: It will be over by January
18 6th. It should be over by January 6th. All the
19 answers would be out.

20 Here's another thing, the President was
21 very clear about, he said: You know, I don't have
22 any trouble leaving on January 20, if I lost. If
23 I've lost, I'll go, I'll walk to the airplane,
24 I'll leave. All this stuff about him wanting --
25 you know, but he said: I don't want to do that

1 and -- if the election was stolen from me, and I
2 just want an answer, Pat -- Pat Cipollone, and
3 you're not doing anything to get me --

4 DR. CORSI: He'll do nothing. He has --
5 Pat Cipollone has no intention of helping Donald
6 Trump.

7 PATRICK BYRNE: We had a -- we have a plan
8 that doesn't involve the military, it doesn't
9 involve seizing computers, it involves inspecting
10 and -- you know, it's organized by General Flynn,
11 and it's organized to a further- -- you know, to a
12 -- fairly well -- that would require -- that would
13 allow the -- the inspection of certain machines in
14 certain places. We have teams, everything is
15 aligned. It's like a -- you know, we have an op-
16 -- an -- an execution list, and all the assets and
17 everybody ready to do it. And by January 4 --
18 really by about December 31st, even if he signed
19 it today, we would have the answer by December
20 31st, maybe January 2nd or 3rd, at the latest --
21 4th at the latest, we're going to have the answer,
22 America would know, was the election rigged or
23 not; and then on January 6th, Congress could make
24 an informed decision.

25 Why are people fighting just having

1 transparency? This is all about -- they don't --
2 they're fighting letting there be an inspection of
3 the elect- -- of the election.

4 DR. CORSI: They want to get a theft --
5 say, don't worry about this, there's nothing to
6 see here.

7 Now, look what you're telling me -- and I
8 want to really get this point down hard, and that
9 is there's a small group that could -- could save
10 Donald Trump.

11 PATRICK BYRNE: Yes. In a New York minute.

12 DR. CORSI: General Flynn --

13 PATRICK BYRNE: No problem at all.

14 DR. CORSI: And the military intelligence
15 guys in Flynn's unit, which have already produced
16 a report showing how communist China owns this
17 Dominion voting systems, and how they are inside
18 it and the data is going to Iran. This is a
19 national security issue. Okay.

20 PATRICK BYRNE: We don't really know that
21 the Chinese own it, but I can promise you --
22 although there are some very murky transactions --

23 DR. CORSI: Yes, they -- they bought
24 something -- whether they own it outright or what
25 they -- they have made an investment in this

1 company through a shell corporation, and that's
2 been revealed in the SEC filings (inaudible) --

3 PATRICK BYRNE: The HSBC -- the Hong Kong
4 and Shanghai Banking Corporation has all the
5 intellectual property pledged to it of Dominion.
6 There's so -- you know, whether it's equity or
7 it's a preferred return- -- it's a preferred piece
8 -- there's a -- there's some kind of financial
9 transaction, but what's more important than who
10 owns what is that we know for a fact -- and I -- I
11 have to be careful what I say -- but we now have
12 all the IP data that shows China was on a machine
13 -- well, there's -- there's many examples of this,
14 but we now have a complete soup-to-nuts forensic
15 trail showing a -- a counting machine in a U.S.
16 swing state being accessed through a -- in -- you
17 know -- you know what the internet of things is?

18 DR. CORSI: Oh, yes. Of course.

19 PATRICK BYRNE: The -- an appliance in a
20 room -- that was in a room where the counting
21 machine was, and there was a wireless card in the
22 Dominion machine that was accessed from an
23 appliance, and you inspect that appliance, the IP
24 that was accessing it traces all the way back to a
25 city in China, to a corporate headquarters, and

1 it's a corporation that you probably have heard
2 of, and its name is on the list of those
3 corporations that are really sort of front for the
4 Chinese CCB.

5 So the Chinese CCP was coming through the
6 internet and through an appliance in a room
7 accessing the wireless card in the counting out --
8 in account -- account -- Dominion counting machine
9 during the counting.

10 DR. CORSI: It's through a thermo- --
11 thermostat; they can take a thermostat and have it
12 bounce the data through an IP back to China; so it
13 doesn't happen right in the computer itself. And
14 --

15 PATRICK BYRNE: And let's not talk anymore
16 about who -- who -- exactly where and how they did
17 it, but --

18 DR. CORSI: Okay.

19 PATRICK BYRNE: We have it all. We have it
20 all.

21 DR. CORSI: That's --

22 PATRICK BYRNE: It's (inaudible) --

23 DR. CORSI: That would be my -- that's my
24 guess, and from little pieces I've had.

25 But I want to go back to another thing.

1 Donald Trump -- okay. So you go over to the
2 residence now, and I've been in the residence; and
3 so you get up there, it's kind of cozy, the secret
4 service is standing in the hall, but you get in
5 this little private office and close the door, and
6 you -- and Donald Trump orders some food up.

7 Now, what he's doing is, he's treating you
8 like -- you know, like good friends, like he --
9 he's being a host.

10 PATRICK BYRNE: Right.

11 DR. CORSI: Now, through that he's saying
12 to himself -- he's kind of letting his hair down a
13 little bit -- I've been with him in moments like
14 this -- where he says: You know, I really don't
15 have to do this.

16 PATRICK BYRNE: Right.

17 DR. CORSI: I could just go golf; why --
18 why did I ever even think to do this? It was
19 insane.

20 PATRICK BYRNE: That's exactly what he
21 said. That -- yeah, he said: You know, I can
22 leave here, my life will be good, I'll be in the
23 sun, I'll be golfing; I'll be totally fine. If I
24 lost the election, I'm totally fine. You don't --
25 you know, it's not right to ask me not to do that,

1 not knowing whether or not I won in a landslide.

2 I think I won in a landslide, and I just want -- I

3 just want the answer, Pat.

4 DR. CORSI: Well -- and, see, look, there's

5 a couple of things -- first of all, they tell you

6 all this and Donald Trump -- the first time you

7 come into the White House, it's kind of a dump,

8 quite frankly. I mean, it's an elegant dump, it's

9 a big museum. But Bill Clinton called it the

10 crown jewel of the federal prison system; you

11 can't even go down the street for a Starbucks if

12 you wanted one.

13 PATRICK BYRNE: He called it that? Who

14 said that?

15 DR. CORSI: Bill Clinton said the crown

16 jewel of the -- the federal -- it -- the White

17 House --

18 PATRICK BYRNE: Well --

19 DR. CORSI: -- well, the first thing you do

20 when you come in the White House, you say: Oh,

21 isn't this all elegant, look at this, isn't this

22 wonderful? I'm in a museum.

23 The next thing you say is: This place is

24 kind of small. You know, it's really kind of

25 tiny.

1 PATRICK BYRNE: Well, 200 years ago people
2 were a bit smaller than we were. The average
3 height was about five-foot-six or something,
4 five-foot-seven --

5 DR. CORSI: And nobody had a house like
6 this 200 years ago. Now Donald Trump has got --
7 go to the -- if you've ever been in Donald Trump's
8 offices, they're like -- you've got marble, you
9 have gold, you got elegance, you got people
10 waiting on you; why do you have to go do this
11 stupid thing in the White House? And -- you know,
12 you're here after how many other presidents and
13 how many people have used this place, and nobody
14 stays there permanently, so nobody really takes
15 care of it.

16 Harry Truman got the White House, he had to
17 gut the whole thing after the Roosevelts, and
18 rebuild it from the inside out. I mean, that's
19 how badly --

20 PATRICK BYRNE: (Inaudible) security
21 reasons for that, too, because --

22 DR. CORSI: Yeah. Well, there are. But
23 the point is this -- I'm -- I'm going -- driving a
24 different point here. I'm saying that Donald
25 Trump basically gets into these moments, which is

1 natural, to say: Why do I have to do this? And
2 -- you know, it reminds me of -- of hard things
3 that other presidents and other people have had to
4 do, or -- at Christmastime, I'm sure Jesus Christ
5 in the Garden of Gethsemane praying, couldn't you
6 just take this cup from me? Why do I have to do
7 this?

8 PATRICK BYRNE: Yeah, that -- he basically
9 said I need this like a hole in the head. He
10 didn't say those words, but that was the attitude
11 to summarize, like I need this job like a hole in
12 the head; my life would be great without this job.

13 But he also knows the republic needs him to
14 stand tall right now, he -- they -- it --

15 DR. CORSI: Well, it -- it's a --

16 PATRICK BYRNE: -- (inaudible) needed this
17 nonsense, we don't get another bite at that apple.
18 You know, they have asked us to surrender over
19 recent years and decades on all kinds of core
20 principles, like freedom of speech, now hate
21 speech isn't free speech, say the NPCs, freedom of
22 assembly. Look at what's happened with the goon-
23 -- with the agonism that's taking over America and
24 they're allowing goons to bring political violence
25 to intimidate people, hope -- who peaceably

1 assemble with positions they don't like. Nuns
2 being forced to pay for abortions and -- and just
3 freedom of religion has eroded. Rights of the
4 innocent until proven guilty. Look at Kavanaugh.

5 On and on they've eroded, but the core
6 concept of our tradition -- and you know as a
7 political scientist, the tradition of the core --
8 the atomic concept is consent of the governed; and
9 what it -- how do you know what it is to which the
10 governed consent, you hold a free, fair and
11 transparent election.

12 They have clearly violated that. If they
13 -- if we allow -- if we bend a knee to this one,
14 it's the most atomic concept and we don't get
15 another chance. We have surrendered way too much
16 ground. And if we surrender on elections that are
17 free, fair and transparent, that's the end of the
18 American experiment.

19 DR. CORSI: And -- and finally, you know,
20 these great heroes -- I mean, you finally get to
21 the point where they say: If I don't do it, who's
22 going to do it? If I don't stand up for this,
23 who's going to stand up for it?

24 PATRICK BYRNE: Right.

25 DR. CORSI: I mean, and -- and at that

1 point -- you've been CEO, when you get to one of
2 those points in your business, what do you do?

3 PATRICK BYRNE: Well, you -- you have no
4 choice. You are the steward as -- in the
5 business, you're the stew- -- steward of the
6 capital of other people of the hopes and
7 aspirations of other people. And you -- you don't
8 have any choice, you keep marching.

9 And I think the President has -- you know,
10 he's right, he more or less said: I don't have --
11 of course I can't -- the -- well, we told him --
12 General Flynn told him: Sir, this is not about
13 you, this is not about Donald Trump; this is about
14 the American republic.

15 If -- and he basically said the same thing:
16 If you let them do this and rig an election
17 without even getting to the bottom of what
18 happened, that you're -- you're just not allowed
19 to do that. That's more or less what he -- and --
20 and President Trump had -- didn't need Michael
21 Flynn to tell him that. President Trump knows --
22 knew all that already.

23 But he's got these mendacious mediocrities
24 led by Pat Cipollone -- you know, lying to him,
25 giving him the worst legal advice I have ever

1 heard. And finally, he's saying things like: If
2 -- you know, telling President Trump that if you
3 don't accept this and just walk away, and just
4 take it -- although he doesn't put it into those
5 words, he says it in terms of you can't do
6 anything. Anything that gets proposed, he says:
7 No, no; you can't do that. No, you can't do that.
8 Oh, no, no; you can't do that one either.

9 Until he -- if he -- he -- we knew -- we --
10 we reached the point where we were saying -- well,
11 they were at one point saying no without even
12 having a reason; and then they would turn and
13 discuss with each other, let's come up with a
14 reason, basically. But they were just saying no
15 reflexively. It was so transparent. It's
16 transparent.

17 That's the funny thing about crooks. You
18 know, Buffett says: Sometimes crooks just look
19 like crooks.

20 Well, go and look up a picture of Pat
21 Cipollone, and he acts just like he looks. He's a
22 little weasel.

23 DR. CORSI: If you were a CEO in that
24 situation, what would you do with Pat Cipollone?

25 PATRICK BYRNE: I would have -- I would

1 have fired the guy in a New York minute. They
2 would have -- I would have fired the guy on the
3 spot --

4 DR. CORSI: And --

5 PATRICK BYRNE: -- let alone when he stood
6 up and started shouting, he started shouting at
7 the President, which is when things started
8 getting heated. And -- you know, it -- so it --

9 DR. CORSI: Those are the moments when
10 Cipollone is feeling loss of control, and he wants
11 to get back -- get Donald Trump back under his
12 control; is that what you saw going on?

13 PATRICK BYRNE: Yeah. When -- when
14 President Trump started hearing from us -- no,
15 there are alternatives. There's all kinds of
16 attorneys (sic) -- Barack Obama signed a finding
17 that would be of use to the President now.
18 There's a 2018 finding called Foreign Interference
19 -- an executive order about foreign interference
20 in domestic elections. It gives the President all
21 kinds of power.

22 You know, the -- by federal law, these
23 machines are -- have to be and the -- the data and
24 everything has to be maintained for 22 months. 22
25 months. There's a reason that's the law. The

1 reason that's the law is if an something untoward
2 happens, as clearly happened in this election
3 where they're shutting down voting counting --
4 vote counting and things like that, the American
5 people who need to have faith in their elections
6 could examine, could inspect, and determine what
7 actually happened.

8 There's -- that's the reason there's the
9 law. Can anyone honestly say that the threshold
10 of -- has not been met of -- that should trigger
11 Americans get to inspect the actual -- the data --
12 the -- the raw data and see what happened, and
13 inspect -- you know, that -- that's the reason
14 they -- there's a law these people have to keep
15 the machines and keep the tapes and keep the --
16 the data.

17 We clearly have reached a threshold of --
18 there's -- you know, not probable cause in the
19 sense of criminal activity, we got to put people
20 away; but clearly there were enough irregularities
21 about this that it -- it -- it bears an
22 inspection. Let's just have an inspection.
23 That's all we're asking.

24 And the lawyers are like: No, no; you
25 can't do that, because -- because -- because --

1 because the sun's rising in the west, and because
2 the Japanese yen is doing this; and no, you can't
3 do any of that.

4 It was bizarre. It was surreal.

5 DR. CORSI: You know what President Lincoln
6 said about why he kept Grant, because everybody
7 says he's a butcher, he's this, he's a drunk; what
8 -- do you know what --

9 PATRICK BYRNE: (Inaudible) my favorite
10 lines of Lincoln, it was -- I think it was
11 (inaudible) wife who said something about: How
12 can you be promoting that man? He's a slob. He's
13 a drunk. And is that -- and Lincoln said: You
14 know what, madam, find out what that brand of
15 whiskey the man drinks so that I might send my
16 other generals a barrel of it.

17 DR. CORSI: That's right. And he said:
18 Finally -- to somebody he said: Why do you keep
19 -- you know, why do you keep Grant, he's this --
20 just like Donald Trump, they would demonize these
21 people who are going to win the war. And -- and
22 -- and Lincoln said: I keep him because he
23 fights.

24 PATRICK BYRNE: Right.

25 DR. CORSI: He fights.

1 PATRICK BYRNE: Yeah.

2 DR. CORSI: With --

3 PATRICK BYRNE: (Inaudible) if he made
4 Flynn his general coun- -- his Chief of Staff, and
5 Sidney as general counsel, this thing would be
6 over by New Year's Eve.

7 DR. CORSI: It -- it would be over by noon.

8 PATRICK BYRNE: Yeah. Yeah.

9 DR. CORSI: You know, because -- again, so
10 McCollum could never cross the Potomac and do a
11 fight. Every time he won a victory, he went back
12 and licked his wounds. And General Grant comes
13 on -- General Grant says -- Lincoln says: If I
14 give you the Army, what are you going to do? And
15 grant says: Wherever Lee is, I'm going to be.
16 And I'm going to fight this guy, and we're going
17 to kill the- -- because you have to kill the enemy
18 or you're not going to win. So he went to battle.

19 Trump needs people around him like you,
20 like Flynn, like Sidney Powell, who will fight for
21 him.

22 PATRICK BYRNE: I'm -- I'm not -- I'm not
23 -- I'm not one for government certainly --

24 DR. CORSI: No, you don't have to be
25 government, Patrick. Just stick around and -- and

1 talk to them.

2 PATRICK BYRNE: Well, I'm not even fighting
3 for President Trump. I'm fighting for the
4 constitution. And I know what's coming if we bend
5 a knee to this. And that -- and so I want to --
6 so I actually like President Trump much more than
7 I had anticipated. I think he's a very fine man.
8 I really enjoyed him. All this stuff about him
9 being a racist (inaudible) is total nonsense.

10 But I did not -- I -- I think he cares a
11 great deal about the country. He's not selfish.
12 And -- so I don't even see it as fighting for him,
13 I fight for the constitution; which -- you know,
14 if this were happening to Barack Obama, I would be
15 doing the exact same thing. I probably would have
16 done it a bit earlier. I felt an obligation to
17 bend over backwards to stay out of it; but if this
18 had happened to Obama or Bush or Clinton, I would
19 be doing just the same thing.

20 But at this point I've really come to have
21 an affection for Trump that I know I -- I did not
22 anticipate I was going to have.

23 DR. CORSI: Well, Trump has been so
24 demonized that everybody has this idea of him, and
25 -- you know, Lincoln was demonized. They called

1 him a monkey, they called -- I mean, they -- there
2 are forces that don't want to win, the forces of
3 evil --

4 PATRICK BYRNE: Right.

5 DR. CORSI: -- who want to destroy the
6 country, always demonize those who are going to
7 succeed. I mean --

8 PATRICK BYRNE: Right.

9 DR. CORSI: -- look at Patton, how he was
10 demonized.

11 PATRICK BYRNE: Yeah. He just won. Yeah,
12 you know, these -- it's a certain mentality you
13 sometimes come across among the intellectual class
14 that -- well, first they hate America. These
15 people hate America. I've been around it. A lot
16 of these people just deep down hate -- on the
17 left, they just hate America. And I think they
18 would love us to lose to China. I think that they
19 really have just very low self-esteem and their
20 way of handling their bitterness is to be lefty
21 goons.

22 DR. CORSI: Well, the -- again, all these
23 heroes we're talking about, looking at the picture
24 of Church- -- a picture of Churchill, looking at
25 the pictures of Lincoln; what Donald Trump is

1 reaching into himself to find and -- is that
2 bottom line, if I don't do it, who's going to --
3 who is -- who else is going to do it?

4 PATRICK BYRNE: Correct.

5 DR. CORSI: And it's my job to do it. And
6 I'm going to take that job.

7 I mean, go -- I'm -- I'm confident Jesus
8 Christ in the garden -- Garden of Gethsemane,
9 knowing what was coming, had to think: Why do I
10 have to go through this.

11 PATRICK BYRNE: Yeah. Talk about someone
12 who needed that job like a hole in the head.

13 DR. CORSI: Yeah. I mean, what -- what am
14 I here doing this for?

15 PATRICK BYRNE: Right.

16 DR. CORSI: Yeah. Son of God, and I'm here
17 doing this for these people?

18 PATRICK BYRNE: Yeah. But he's got an
19 obligation, as President Trump understands his
20 obligation. General Flynn a couple times started
21 -- you know, even said things like that, but
22 President Trump showed he didn't -- I mean, he --
23 he didn't -- he didn't need General Flynn to tell
24 him, but it -- that we're all thinking along the
25 same path; as ugly as this is, as horrible as this

1 is, he has an obligation not to fall to a rigged
2 election.

3 And all that means is let's have some
4 transparency. There's a reason the law is written
5 that way. There's a reason that we -- that the
6 law is written that -- so these machines are
7 inspectable, the data is inspectable. Let's
8 inspect it. We could be done by January 4th, and
9 on January 6th that Congress could make an
10 informed decision, and -- and the state
11 legislatures can make an informed decision, and
12 the Congress can make an informed decision.

13 That's -- you know, what's wrong with that?
14 What's wrong with a little transparency?

15 DR. CORSI: Yeah, we the people want to see
16 courage. I want to see courage here. Let's get
17 -- let's do the right thing. I mean, why are we
18 giving in and taking a knee to this crap?

19 PATRICK BYRNE: Right. Well, (inaudible)
20 media is -- I mean, they're really in the business
21 of just distorting the truth --

22 DR. CORSI: Well, shut them down under that
23 Insurrection Act. They're helping China. Shut
24 them down take.

25 PATRICK BYRNE: No, we don't have to --

1 DR. CORSI: Take -- freeze their assets --

2 PATRICK BYRNE: -- do anything like that.

3 We don't have to do anything like that.

4 I think we do have to say that our -- our
5 internet platforms, which have protection from all
6 the -- don't have to face libel charges, because
7 they're just supposed to be neutral platforms,
8 between their -- just their algorithms and their
9 outright censorship, they have -- they clearly are
10 publishers; whether they -- you know, it's a new
11 concept that wasn't around 20 years ago when that
12 law was written, but they clearly have become
13 publishers and they should be -- lose their legal
14 protection from -- from lawsuits for libel,
15 because when you're -- when you're suppressing the
16 kind of stories the way they do and you're
17 boosting the other stories, and you're not just
18 suppressing some stories, you're outlawing some
19 stories, you are now a publisher. Whether or not
20 -- you can't just be -- see yourself as a neutral,
21 you know, platform like you're a tree in the town
22 square that people are going and nailing -- you
23 know, a pamphlet to. You've become a publisher.
24 DR. CORSI: Patrick, if you're going into a
25 fight, who do you want around you? Do you want --

1 you go into it with a guy like Rocky, you want to
2 go around with guys who are telling you, you can
3 win? You want to go around -- who are you going
4 to pick to go into the most difficult fight of
5 your life, who are you going to pick? A CEO.

6 PATRICK BYRNE: Well, people who want you
7 to win, people who think you can win, people --
8 well, most fundamentally, people who want you to
9 win. Trump is surrounded by leaders who have --
10 in his White House who do not want him to win.
11 And the Republican party -- McConnell, who's a
12 crook, who's in the pocket of China, you ought to
13 -- Americans ought to vote -- keep track of what
14 Republicans stand tall in the saddle, and which --
15 which are part of this. And I think we're going
16 to get an x-ray of the establishment over the next
17 couple of weeks. We're going to see which people
18 are really in the pocket of China, who surrender
19 monkeys, who stand for nothing, who are go-along
20 guys, like Mark Meadows who are just -- pardon me
21 -- but just pussified.

22 I know you're probably not cool with that,
23 but I just -- it -- you know, I'm --

24 DR. CORSI: It doesn't -- it doesn't bother
25 me.

1 PATRICK BYRNE: Truman said of an opponent:
2 I could carve a better man out of a banana.
3 That's the -- you know, that's the best. That's
4 Mark Meadows. That's Mark Meadows. I mean, he's
5 just a banan- -- you could carve a stronger man
6 with a more backbone out of a banana.

7 When you get to people like Pat Cipollone,
8 you're talking about actually bad guys. They're
9 -- they're not just neutral-flabby indecisive,
10 you're talking about bad people who want -- who
11 actively want the President to lose.

12 If Mark Meadows thought that it was to his
13 benefit tomorrow or -- I mean, Mark Meadows has to
14 see which way the wind's blowing, and then -- he's
15 one of these leaders, which way is the wind
16 blowing? Okay, I'll lead people that way. He's
17 one of those guys.

18 The other people are venal. They're -- and
19 Trump --

20 DR. CORSI: (Inaudible) when Trump -- Trump
21 gives an order, and these other people don't do it
22 -- I mean, when you want to give an order as CEO,
23 and the people actually do it, go out and fight
24 for what you want done --

25 PATRICK BYRNE: Right --

1 DR. CORSI: -- instead -- instead of it
2 coming back with excuses as to why it can't be
3 done.

4 Agent X, you wanted to say something?
5 Please, go ahead.

6 AGENT X: Yeah. This is -- so -- so,
7 Patrick, in your opinion -- I mean, you have
8 people like General Flynn and Sidney Powell and
9 yourself around Trump, and he sees that you're
10 patriots and these other people are -- are
11 undermining him, what's stopping him from making
12 the decision to get rid of those unpatriotic
13 people and -- and -- and put in the right people?

14 PATRICK BYRNE: He's very loyal. He's very
15 loyal. And he's loyal to Rudy, and Rudy's a
16 wonderful man, and they're old friends. And I
17 don't know if he has many old friends left, but
18 Rudy isn't the fellow to storm the beach, in my
19 respectful opinion. I love Rudy. He's America's
20 mayor.

21 Rudy has stormed the beach many times in
22 his life. He took down the mafia. He took down
23 -- you know, he was 9/11. The mayor on 9/ 11. He
24 has stormed the beach enough. It's time -- Rudy
25 should be the General Marshall of this effort. He

1 should be the guy -- George C. -- George C.
2 Marshall was in the Pentagon during World War II,
3 and both F- -- well, FDR and Churchill -- and I
4 think even Stalin said this is like the finest man
5 I ever met in my life, they all thought was George
6 Marshall. He was an extraordinary man.

7 And when the opportunity -- when the time
8 came to invade Europe, you know, Marshall --
9 Marshall knew whoever was going to lead that Army
10 was going to go down in history. And he -- and
11 the -- President Truman -- President Roosevelt
12 asked him -- you know, formally offered it to him,
13 but -- but also said: I couldn't sleep night- --
14 nights that George Marshall were -- was out of
15 Washington D.C., I couldn't sleep. He was the
16 most competent able man.

17 And Marshall knew and wanted the job, and
18 knew that he would go down in history for taking
19 it; but he wouldn't give the President an answer.
20 He wouldn't say, yes, please give me that job. He
21 just said: Sir, you -- you know, that's not my
22 decision, and you have to do -- and finally
23 Roosevelt decided I can't sleep with George
24 Marshall outside of Washington D.C., and they gave
25 it to this younger General Dwight Eisenhower, who

1 was the big historic general and became President;
2 and they all knew that was going to be the case.

3 But Rudy should be the George Marshall by
4 the President's side, advising the President.
5 He's -- he's -- he doesn't have to storm the
6 beaches at Normandy. He has stormed the beaches
7 at Normandy, he stormed the beaches at
8 Guadalcanal, he stormed the beaches in the
9 Philippines -- where was it that MacArthur went
10 ashore -- you know, he's -- he's -- he has stormed
11 enough beaches, and he's 76. He's not the fellow
12 to storm this beach, he's the -- he should be --
13 he should be the George C. Marshall advising the
14 President, and talking to the President.

15 My view is Sidney Powell is the one who
16 storms -- should storm this beach. If she storms
17 this beach we win. She storms the beach and you
18 let Mike Flynn be -- you know, Michael Flynn
19 doesn't even have to be -- even have to have an
20 official role, but just let's see -- let him work
21 for Sidney Powell. He's a wonderful strategist.
22 He's a brilliant man. He's also a really fine
23 gentleman. And he -- let him storm the bea- --
24 let Sidney Powell storm the beach, and let Rudy be
25 like George C. Marshall back in Washington and

1 advising the President.

2 DR. CORSI: And with -- with this kind of a
3 combination -- I mean, you get -- so I -- I agree
4 with you entirely. I think you got it analyzed
5 correctly.

6 And the -- you know, you get a resolve here
7 to go in. Rudy is terrific, and will play the
8 George C. Marshall role. Sidney Powell, as a
9 woman -- especially -- Washington really hates to
10 see a woman win for Donald Trump. Let her go do
11 it.

12 PATRICK BYRNE: Yeah, let her -- and she
13 would. You know, she would. She's so far -- let
14 me tell you, I came here the day after -- well,
15 the -- the day after the election I got in touch
16 with Rudy and Sidney, and started bringing them
17 information. And so I've actually been on this
18 since August. I knew what the goons were going to
19 do. And that's a story for another day.

20 But I knew that they were going to steal
21 this. And there's a group of cyber guys who were
22 on this, too, and they -- they were on this and we
23 met up in August, and I started funding things;
24 and we had this plotted out what they were going
25 to do. They -- Sidney -- Sidney got it

1 immediately. Rudy -- you know, Rudy under- -- but
2 Rudy -- Rudy's in a different place. Rudy came at
3 this a bit differently. He -- I mean, he's smart
4 as a whip, but Sidney had already, I would say,
5 figured out what had happened.

6 And I think it was when we went to the more
7 -- she had already figured out what happened, she
8 didn't have the technical knowledge, didn't have
9 the data, didn't have the math- -- mathematicians
10 and stuff, but when we went in and explained -- I
11 think it was the Thursday or the Friday after the
12 election what we saw had happened, we had already
13 carved things out and we found that -- just how
14 they had done it; which as -- as everybody gets by
15 now, they picked -- and as you understand as a
16 political scientist -- they -- there's six
17 counties in America -- you don't have to steal
18 across America to steal America, there's six
19 counties that if you just steal those counties,
20 you steal the country. You flip the states
21 they're in, you flip the electoral college, you
22 steal the country.

23 We had that all sort of deconstructed,
24 reverse engineered by the Thursday after the
25 election or the Friday. Sidney was totally super

1 receptive to what we had to say. It was a little
2 far-fetched for other people in Washington, but
3 Sidney got it immediately, and she's so far ahead
4 of everyone else on this. She -- this will be
5 over by January 4th, in ten days we can have
6 everything done and an answer for America.

7 And, hey, if Joe Biden won, I'll be the
8 first to say President Biden. That's fine by me.

9 DR. CORSI: He didn't win. He stole it.
10 You know that.

11 PATRICK BYRNE: My father was an actuary
12 and I grew up on this saying, the saying of the
13 American actuarial society is: Substitute facts
14 for impressions. We all have -- our impressions
15 about what happened on November 3rd. Let's --
16 let's get some -- get the facts; 10 (inaudible)
17 days.

18 DR. CORSI: And Patrick, I don't think
19 people know you put this team together, even
20 before the election. So you've got experts in
21 place?

22 PATRICK BYRNE: Oh, yeah. We have experts
23 in place. We've been working on it for months.
24 We already reversed engineered a lot of what
25 happened. And we would like to go and pull some

1 data off these machines.

2 Dominion can be there. The democrats can
3 be there. We can have cameras on the machines.
4 Just let us touch -- access the machines for a
5 couple hours -- bom-bom-bom, bom-bom-bom -- give
6 us three or four days to crunch some numbers;
7 we'll be able to tell you what happened.

8 DR. CORSI: I want you to bring -- you come
9 can back with some of those guys, let's just show
10 the American public right here.

11 PATRICK BYRNE: Phil Waldron. Phil
12 Waldron, you've seen him. He spoke at Michigan.
13 He spoke at Arizona. He spoke at some of those
14 hearings that -- he was next to Rudy. He
15 explained things. He's the fellow who wore that
16 mask in Pennsylvania and he spoke immediately
17 after Rudy -- Mayor Giuliani did. And he -- he
18 can -- he's a -- he and the hackers -- he's really
19 the CEO of a company that -- and there's another
20 fellow named Russ Ramsland -- and they all -- they
21 attack the credibility of these guys and are --
22 are they real technologists, this and that; no,
23 these guys are CEOs of cyber companies. Under
24 them are the computer forensic guys who are the
25 licensed certified forensic computer -- you know,

1 they -- they have the certifications that let them
2 take data off machines, and present it in court.
3 This whole thing can be done under the nose of
4 U.S. Marshals; and we can get it, and we can make
5 it happen.

6 But for some reason --

7 DR. CORSI: (Inaudible) bring -- can we get
8 them -- can we get them here tomorrow or over the
9 weekend? Or let's just keep going.

10 PATRICK BYRNE: Well, I -- I would love
11 that. I don't control their schedule, it's
12 Christmas.

13 DR. CORSI: Well, you --

14 PATRICK BYRNE: But I can put in a good
15 word for you with Phil.

16 DR. CORSI: Well, I want you there, too.

17 PATRICK BYRNE: Okay. He's a -- okay.
18 Well, I'll text him as soon as we're off and see
19 if he feels like coming on and -- and I'll connect
20 you by text, and leave it up to him.

21 DR. CORSI: Yeah. I -- I want you to get
22 the -- all these guys, let's explain it chapter
23 and verse to the American people. Let's show them
24 what they know. And you've got the team, let's
25 just be CEO here -- you could be CEO of this

1 project, figure out who we need to talk to, we'll
2 get them in here.

3 PATRICK BYRNE: Copy. We'll go.

4 DR. CORSI: Okay. And also from President
5 Trump, I don't want you to give up trying to talk
6 to him. You're talking to him right now. He'll
7 be listening to this; what would you have to say
8 to President Trump?

9 PATRICK BYRNE: One thing I would say:
10 Sir, is as we parted on Friday night, I started
11 trying to tell you something, it was 12:10, I
12 stumbled a bit; I know something that you don't
13 know about a cover-up, and I can tell you
14 something that will change this whole scene for
15 you. You give me two minutes, sir. Give me two
16 minutes and I can tell you something that will
17 expose a cover-up and change this entire picture
18 for you.

19 The other thing I would say is keep
20 fighting. What I really want to say is to the
21 American people, this is not a time -- what's that
22 Shakespeare line about sunshine shoulder --
23 fairweather soldiers or something?

24 DR. CORSI: Uh-huh. Right. It's -- it's
25 -- it's in one of the -- it's one of the --

1 PATRICK BYRNE: Was it Henry?

2 DR. CORSI: We -- we -- Henry --

3 (inaudible) small band of men here will remember

4 this forever --

5 PATRICK BYRNE: Well --

6 DR. CORSI: -- you know --

7 PATRICK BYRNE: -- this is that moment for

8 us. This is that moment. We're about to lose our

9 country to a rigged election. It doesn't matter

10 how you feel about Donald Trump or whether you

11 voted for him or not. I didn't vote for him, but

12 the right thing to do is you cannot let this

13 happen. On August 4th -- January 4th, 5th and

14 6th, there have to be mass demonstrations around

15 this country in every state capital and in

16 Washington D.C.

17 We're going to -- we're trying -- we're

18 asking millions of people to come to Washington

19 D.C.; if you have to camp out -- you know, if you

20 have to camp out on the mall, camp out on the

21 mall. Let it be our Valley Forge. 4th and 5th

22 and 6th, Congress is meeting on 1:00 p.m. on the

23 6th. We have to have been here for a couple days

24 already, and we don't raise hell. We're not the

25 violent guys, we're -- we're better than the other

1 guys. We're several steps better than the other
2 guys. The other guys are probably going to try to
3 bring violence and intimidation; let us -- let's
4 show them with love and in peace that we're not
5 going to be intimidated, we're not -- we're not
6 going to be intimidated and we have -- you have to
7 -- if you -- you know, if you don't do this now,
8 America, I promise you within six months to a year
9 you're going to be regretting that you do not --
10 that you -- this -- you'll have understood this
11 was your last moment to have made a difference.

12 So come to Washington D.C. on January 4th
13 and January 5th for mass protests like this city
14 has never seen. And if you can't make it here, do
15 it in your state capital. And I mean -- you know,
16 the same rules apply to us as apply to them. And
17 -- and only we're going to do it peaceably. We're
18 not going to be like the goons.

19 I do think it's time we say if the goons
20 show up with their violence, we can't -- we cannot
21 be intimidated. We cannot be intimidated anymore
22 if the -- if the goons have introduced political
23 violence into the discourse, we don't have to take
24 it anymore. And if -- and if the police are not
25 going to protect us, it's -- you know, the right

1 of (inaudible) John Locke, the most fundamental
2 right you have -- you know, a dog has the right to
3 self-defense. We're free men, we do not take
4 being intimidated by goons.

5 So come, but other than that, we're going
6 to be -- we want to have the moral high ground. I
7 mean, not other than that -- we always want to
8 have the moral high ground. We're going to be
9 better than the other guys, but we're not going to
10 be intimidated. And if you don't want -- if you
11 want to stop this, come to Washington D.C. on
12 January 4th, 5th and 6th, and be prepared to show
13 Congress that it -- we're not going to let slide
14 -- we're not going to bend a knee to them taking
15 away the most fundamental concept of our
16 tradition, which is consent to the governed.

17 If you let this one slide, you -- you're --
18 it could be 1,000 years of darkness.

19 DR. CORSI: Well, there's going to be 1,000
20 years of peace and 1,000 years of light, because
21 we're going to fight this thing. And I -- I --

22 PATRICK BYRNE: Trump loves you.

23 DR. CORSI: Let's call -- let's call people
24 to Washington. Let's call -- how about the
25 caravans? Get out of the caravans again. Get the

1 --

2 PATRICK BYRNE: Right.

3 DR. CORSI: -- boat caravans, the car
4 caravans. Let's get out in the streets again with
5 the Trump flags. Let's quit being afraid of these
6 guys.

7 Would you agree with that, Patrick?

8 PATRICK BYRNE: Absolutely, stop being
9 afraid of them. Absolutely, we do not want to be
10 the violent guys; but if they think they're going
11 to intimidate us anymore, it is time for us to say
12 we have -- we have been -- we have let that happen
13 too -- longer than we should have, and we are not
14 going to let it happen now.

15 DR. CORSI: And Sidney Powell and Michael
16 Flynn shouldn't take the fact that Mark Meadows
17 says they can't talk -- just go ahead and be
18 special counsel, let's start going to these stuff
19 -- get -- I'll have them right here, we'll --
20 we'll do the indictment right here.

21 PATRICK BYRNE: You're -- Dr. Corsi, if you
22 can get me five minutes on the phone with the
23 President -- at this point, the secret service,
24 I'm sure I'm on some watch list that I'm going to
25 get shot in the head if I get anywhere close to

1 him -- if you can intercede and give me five
2 minutes with him, I can tell him something that
3 will blow up this -- that will change the entire
4 narrative. I can blowup a cover-up. I only
5 became aware that he -- that there was a cover-up
6 at -- on -- on certain crucial facts, just as we
7 parted at midnight at 12:10 on Friday night --
8 Saturday morning as we parted, I said something to
9 him that I didn't catch, and myself and some other
10 people who were there have realized, he doesn't
11 know something. A very important fact has been
12 kept from him that could change the entire
13 picture, but I need to speak with him for two
14 minutes.

15 DR. CORSI: Well, I pretty well know what
16 that is, I think -- let's do a couple things here.
17 Number one, you were involved in the Barack Obama
18 bribing Hillary.

19 PATRICK BYRNE: Yeah, I bribed Hillary
20 Clinton \$18 million. Hillary Clinton took a \$20
21 million bribe, the FBI told me. In December of
22 2015 they told me. And in January -- January 2016
23 I set Hillary Clinton up on an \$18 million bribe,
24 which she took. And it turned out to be all about
25 blackmail from Barack Obama.

1 I can give President Trump the names,
2 dates, the names of the agents --

3 DR. CORSI: Right.

4 PATRICK BYRNE: -- and exactly where it all
5 happened, and more -- and more that -- that I have
6 not -- that we're not talking about here, but I
7 can bring this whole thing down. But I need two
8 minutes on the phone with the fellow.

9 DR. CORSI: As I read what you wrote --

10 PATRICK BYRNE: (Inaudible) it became clear
11 it's been kept from him. There's a cover-up going
12 on about some crucial information that has been
13 kept from the President. If I have two minutes to
14 give it to him, it will change the whole
15 narrative.

16 DR. CORSI: And -- and from what you've
17 said -- I mean, you were -- they -- the FBI took
18 you out at the last step before the bribe was
19 paid; so you didn't actually see it paid, but you
20 know it was paid -- I know it was paid, too. I
21 mean, everybody -- I -- all my sources says that
22 -- say that bribe was paid.

23 PATRICK BYRNE: It was paid in the spring
24 in the course of the investigation. I was shown a
25 document or a picture of a document that is

1 consistent with that bribe having been paid. It
2 was a bank record that showed the bribe had, in
3 fact, been paid.

4 DR. CORSI: And Barack Obama's purpose, I
5 think there was, to become President himself,
6 because of -- the information we've been told is
7 correct, Putin had the idea that he could get her
8 impeached -- or get her indicted. That bribe
9 would have been nice. Barack Obama might have had
10 two more years in the White House, the same with
11 --

12 PATRICK BYRNE: I heard -- I heard a
13 related, but slightly different version of what
14 was going on.

15 DR. CORSI: Tell us --

16 PATRICK BYRNE: And that may well have been
17 one plan and then there was a backup plan and then
18 there was a backup to the backup plan.

19 DR. CORSI: Tell us about them.

20 PATRICK BYRNE: Well, I -- I think we've
21 said enough for today.

22 DR. CORSI: Well --

23 PATRICK BYRNE: I'll tell the President
24 about it, but I --

25 DR. CORSI: Okay.

1 PATRICK BYRNE: Okay.

2 DR. CORSI: We will --

3 PATRICK BYRNE: -- (inaudible)

4 incidentally, I'm going to get iced. If I get

5 iced, people should go -- yeah, well who cares.

6 DR. CORSI: We know where they should go;

7 you told us which -- which publications. You've

8 published all this before. People just need to

9 read it.

10 PATRICK BYRNE: Deep Capture.

11 DR. CORSI: Deep Capture. Where do they

12 find Deep Capture?

13 PATRICK BYRNE: Deepcapture.com.

14 DR. CORSI: Okay. We're going to have you

15 back, and we're going to have read that and people

16 are going to see that, and then we're going to

17 talk about it.

18 But we'll -- offline, we'll get President

19 Trump your phone number.

20 PATRICK BYRNE: Thank you. Get it -- that

21 would be -- that would be -- that -- that could

22 change history, sir.

23 DR. CORSI: Well, you know, I -- look, I

24 told Mueller to go F-himself. Now we can tell

25 these entire bunch of Biden-Obama criminals to go

1 F-themselves.

2 PATRICK BYRNE: Yes. I -- well, if you get
3 me two minutes on the phone with him, I can tell
4 him something -- it became apparent to us and we
5 put the pieces together afterwards, he's --
6 there's a cover-up going on, and there's some
7 crucial information he needs to know that he's not
8 been told. And it would change this whole picture
9 for him if I have two minutes.

10 DR. CORSI: You'll -- you'll get him.

11 PATRICK BYRNE: Thank you, sir. I'll keep
12 my phone with me.

13 DR. CORSI: Well, we're going to -- we'll
14 -- we'll work on this today, and we'll get this
15 done. President Trump will tell Mark Meadows to
16 go park himself; and hopefully -- he's still in
17 charge. He's still the President. Mark Meadows
18 is not -- I don't recall Mark Meadows having been
19 inaugurated President, taking the oath of office,
20 do you?

21 PATRICK BYRNE: No. But Meadows could be
22 part of the winning team. He could actually be
23 part of the winning team. He doesn't have to fire
24 Meadows. He's got to fire a Pat Cipollone. And
25 --

1 DR. CORSI: Well --

2 PATRICK BYRNE: -- and if he makes Sidney
3 Powell the White House General Counsel, this thing
4 will be over -- you know, this thing will be over
5 by January 4th. And Sidney's with me. Sidney's
6 with me in the sense of -- hey, if the data turns
7 out to be that we are wrong, President Biden. And
8 no one will -- no one will do that more than
9 Donald Trump.

10 Donald Trump -- I know it, when we talked
11 about it, he said if -- you know, if -- if it
12 turns out not to be there, he will be -- he will
13 walk to his helicopter gracefully, fly away --

14 DR. CORSI: Forget that. We -- that's a
15 whole -- that's a nightmare.

16 PATRICK BYRNE: Well --

17 DR. CORSI: I don't even want to think --

18 PATRICK BYRNE: -- (inaudible) --

19 DR. CORSI: -- I know --

20 PATRICK BYRNE: -- the data -- let's see
21 the data.

22 DR. CORSI: Let's see the data. That's --
23 that's -- we're going to do that, we're going to
24 show the data here.

25 PATRICK BYRNE: Yeah.

1 DR. CORSI: Okay. Now, Agent X, you've
2 been listening to this; how do you think we go
3 operational, what do we do?

4 AGENT X: Well, I -- you know, I -- I
5 think that -- right now it sounds like President
6 Trump has to take action to remove the traders and
7 put in the patriots, and -- and, you know, I think
8 if you -- there's a lot of people that are fooled
9 by the media into thinking one narrative that's --
10 that's wrong or that there's no evidence that this
11 is -- just to move on.

12 And I think those people that have that
13 evidence, that have that information, if you have
14 the information and you're not doing anything --
15 you know, you're either a patriot or a trader.
16 You're a patriot if you're stepping up and
17 helping; if you're doing nothing, you're a traitor
18 at that point.

19 And I think he needs to remove those
20 traitors whether he's loyal to them or not, and
21 move forward and put in and -- and, you know, take
22 the services of Patrick and Sidney and -- and I
23 think -- you know, he gets his strength from the
24 American people, 80 million people voted for him
25 and it's growing; even with the media trying to

1 drown this out, people don't -- they don't --

2 don't buy it.

3 PATRICK BYRNE: You know, I think one of
4 the reasons they're going so crazy, Agent X, is
5 they think that they -- they know that they shot
6 their wad. They know that this is -- they -- or
7 they think that what happens to them, as much as
8 they're all going to be rounded up and executed, I
9 would actually advise the President that when we
10 get through this, and get through it we will, we
11 consider what the left -- the left -- I mean, it's
12 a lefty idea, but it's called truth and
13 reconciliation.

14 DR. CORSI: Right.

15 PATRICK BYRNE: It's what they do in
16 African countries when there's a Civil War and
17 people chop each other's arms off and stuff. What
18 are you going to do? Are you going to prosecute
19 50,000 people? No. You give everyone the chance
20 -- it's what they did after Apartheid in South
21 Africa. The prison guards were given the chance
22 to come forward and say what they did, and
23 anything you came out and acknowledged in a
24 hearing -- yeah, I did this, I beat prisoners 32
25 times, I raped one of the prisoners, I kill- --

1 all of that, you come out and say it, you're

2 forgiven. You're just forgiven.

3 If you left something out, then -- and then
4 later as they investigated they found it, they
5 would prosecute you for that. So it created this
6 incentive.

7 DR. CORSI: Right.

8 PATRICK BYRNE: And this beautiful thing
9 happened in South Africa, and all these people
10 came out and said, okay, this is what really
11 happened under Apartheid; that's what needs to be
12 done now. And it would save -- I don't want to
13 put -- I don't want to put Hillary Clinton in
14 prison. I think that she should probably be
15 confined with an ankle bracelet or something. I
16 don't think these people should go to prison.
17 Where -- this is America; we're not going to do
18 this. This was a coup. It was treason. You're
19 going to -- well, sedition, (inaudible) peace sign
20 -- but -- but I don't think that we -- that we
21 should be telling people we're going to be putting
22 thousands of people in prison.

23 Maybe there's some real ring leaders that
24 need it, but this is about -- this is America;
25 we're not going to -- we're not going to wipeout

1 our political class. We should have a truth and
2 reconciliation process after that.

3 And I would be -- you know what I would do,
4 that's what I would -- I -- the some -- I would
5 love to be involved in that. But anyway that's --
6 that's way above my pay grade, which is precisely
7 zero. I'm not even sure I -- I really don't want
8 to go to work for the government.

9 But I'm one step ahead of the sheriff
10 myself, I got to tell you. You don't --

11 DR. CORSI: Well, you -- right now you're
12 not working for the government, you're working for
13 the American people. And I think that's why a lot
14 of us are here, right? It's about our country.
15 It's about our constitution.

16 PATRICK BYRNE: Absolutely.

17 DR. CORSI: We have Arthur with us, too.
18 Arthur, come on in. Arthur is our prayer warrior.
19 He runs the -- the prayerfulpatriot.com.

20 And Craig, what are you -- what are you
21 hearing today?

22 CRAIG: Well, absolutely. And when you
23 interviewed Robert David Steele the other day,
24 along with Dr. Cynthia McKinney and they said both
25 things that you're talking about right now. What

1 Patrick is talking about with the truth and
2 reconciliation, that's exactly what Robert David
3 Steele cede- -- said needed to take place. And
4 Dr. Cynthia McKinney said exactly what we've been
5 saying, it's patriots and traitors now. There are
6 no Republicans. There are no Democrats. There
7 are people that will stand up for the
8 constitution, and there's people that want to burn
9 it down. That's it. It's time for choosing like
10 President Reagan said, and it could not be more
11 clear.

12 DR. CORSI: And I do think Lincoln won the
13 Civil War, and said -- Lincoln always said like a
14 wrestling -- he had experienced wrestling in the
15 American west. He said: Let him up easy. That
16 was his instruction --

17 PATRICK BYRNE: Yeah, let them up --

18 DR. CORSI: -- to Grant, let them up easy.

19 PATRICK BYRNE: You know, when Lincoln was
20 24, he famously got in a fight with some bullies
21 -- do you know that story?

22 DR. CORSI: Yes, I do. Tell it.

23 PATRICK BYRNE: And -- yeah, I never heard
24 that saying, but that's it: You let them up easy.

25 DR. CORSI: You know let them up -- like

1 Lincoln actually told Grant: Let them up -- they
2 had a meeting in the -- on this riverboat, it's by
3 City Point, and they -- it was a war council and
4 -- and Lincoln's last instructions were to Grant
5 were: Let them up easy.

6 PATRICK BYRNE: That sounds just like a --

7 DR. CORSI: Yeah. But -- you know, until
8 -- at the end of the Civil War, when Lee got out
9 of Petersburg, because they were starving and went
10 right into western -- tried to escape towards sp
11 Manassas on -- there's a telegram where Sherman
12 and -- and -- and Grant are trying to decide --
13 you know, they -- they're chasing these guys --
14 they didn't go into Richmond and have a big party
15 with themselves as being heroes, they didn't go
16 and capture the capital. They said, forget the
17 capital, we're going to make sure now we destroy
18 Lee's Army before they get in the hills and
19 continue this revolution.

20 And so they traced -- they chased them out,
21 but they were -- you know, they were beginning to
22 slaughter these guys like a turkey shoot and
23 there's a telegram where, basically, Grant and
24 Sherman are saying, you know, we could probably
25 end this, you know, if -- if -- if we press this

1 thing.

2 Well, if (inaudible) we go kill a bunch of
3 people today, we'll probably end the war.
4 Lincoln's -- Lincoln sent back a very short
5 answer, he said: Let it be pressed. Go kill
6 them. Now, he didn't want to kill them, but he
7 wanted to end it. And once he ended it, his
8 instructions to Grant were: Let the -- you know,
9 let them up easy in the peace terms.

10 PATRICK BYRNE: Right. That's exactly --

11 DR. CORSI: Okay.

12 PATRICK BYRNE: -- the (inaudible)
13 attitude.

14 DR. CORSI: That's what you're saying.

15 PATRICK BYRNE: Right. Exactly.

16 DR. CORSI: Okay.

17 PATRICK BYRNE: You got to end it -- you
18 know, ending this is -- doesn't take violence.
19 Ending this means sending some federal marshals
20 and a -- a dozen white-hat hackers I know -- not
21 hack- -- cyber computer forensic experts certified
22 (inaudible) -- with a dozen federal marshals, look
23 at about -- machines in half a dozen locations,
24 we'll have an answer in -- we can have an answer
25 in four days.

1 And you know what, if we don't do that and
2 we go forward in -- January 6, and they just --
3 and the Congress takes Biden and that question is
4 unanswered, do you think the grassy knoll
5 conspiracy theory has bedeviled American life,
6 there won't be anything like what happened in
7 2020. It will never -- half the country will
8 never accept -- you know, 35 percent of Democrats
9 think the election was rigged, along with 75-80
10 percent of Republicans. I don't know who the
11 other 20 percent of Republicans are.

12 But it tells you that there is -- so if
13 they don't do that, there's no way that American
14 people are going to swallow this. We're going to
15 have four years of violence. I know it's -- I --
16 I won't bend a knee to this. It's -- it's -- it's
17 the -- so if they -- the only way to have a -- a
18 peaceful way for us to go forward is just inspect
19 the machines. Just inspect the machines.

20 And there's a reason that we have federal
21 law that says the machines have to be kept in a
22 condition where they can be inspected for 22
23 months. That's -- this is the reason. This is
24 that moment. If there was that -- you know, can
25 anyone honestly say we have not reached the -- the

1 -- a legitimate threshold of doubt that would
2 justify -- that would -- that would trigger the --
3 the facts of the -- that would trigger the reasons
4 we wrote those laws and those executive orders to
5 be as they are, is there -- you know, does anyone
6 doubt that -- that we have not reached that
7 threshold at this point?

8 DR. CORSI: And look, you're saying some
9 very profound things here, because what you're
10 saying is -- you know, that these swamp creatures
11 that want to keep the fix in, Cipollone wants his
12 million and-a-half dollar salary at some fancy
13 firm, he's going to die, too, eventually. God's
14 going to take him back.

15 What's that -- what's that -- what's a
16 million and-a-half dollars going to do for him
17 when he's facing the throne of heaven?

18 PATRICK BYRNE: Yeah. And you know what,
19 getting invited to those socialite parties, I -- I
20 wouldn't say I grew up around them, but there were
21 periods of my life when I've been to those
22 parties -- America, you ain't missing nothing.
23 You ain't missing nothing.

24 DR. CORSI: All right. Little hors
25 d'oeuvres, everybody is standing around trying to

1 impress each other they're there.

2 PATRICK BYRNE: Buffett calls it an
3 elephant bump -- actually Munger, Buffett's
4 partner calls it an elephant bump. And it's just
5 -- you know how elephants stand around in the dark
6 -- and then -- it's just a bunch of big shots
7 standing around and they go to these parties so
8 they can say -- and sort of bump into each other
9 and be -- I'm an elephant, you're an elephant;
10 yeah, I'm an elephant, too.

11 It's just vacuous. You aren't missing a
12 thing. And -- and you're a traitor if that's --
13 if you sell out your country in order to be part
14 of that.

15 DR. CORSI: Arthur, what do you think?

16 ARTHUR: Well, it's time to take the gloves
17 off. I mean, everybody is dealing with, you know,
18 huge amounts of personal issues and -- and -- you
19 know, what -- Pat, you were saying about Donald
20 Trump and the fact that he's had to deal with what
21 he's had to deal with, and he being a gentle soul,
22 why it's even more important that we're -- we're
23 going to have to start asking for very specific
24 things to manifest around these individuals.

25 And Dr. Corsi, I've -- I've put together a

1 very powerful prayer --

2 DR. CORSI: I want you to read it. Can you
3 read it for us?

4 ARTHUR: I -- I can do it right away. And
5 Pat, I think you're going to see how these are
6 addressed. And -- and these are just for those
7 that don't know, these are petitions and they're
8 just like -- and I've actually been called a -- a
9 spiritual attorney, I don't know why, but it -- it
10 actually -- these are petitions that we're putting
11 before the throne of God that are adjudicated by
12 the dispensation given to us by our Lord and
13 Savior Jesus, in Matthew 18, for agreement.

14 So with that said: In the name of our I am
15 presence that spoke to Moses at the burning bush,
16 and in the name of the self that works with us,
17 that Christ self, we agree together in the name
18 Jesus Christ for the will of God to be made
19 manifest for, the absolute God protection of all
20 patriots standing at defense of liberty who are
21 working to save our constitution, expose the
22 fraud, bring justice and correct the attacks
23 against this nation.

24 The absolute intervention of the host of
25 the Lord into all details of day-to-day life, the

1 current circumstances and events, and to
2 overshadow those who must take the necessary and
3 appropriate actions that are required to be taken,
4 according to your will, to correct the fraudulent
5 2020 elections, stop the coup against the
6 President and administration, and all attempts to
7 convert America into a socialist communist
8 country, to bring to justice the perpetrators,
9 expose the treason and seditious acts against the
10 constitution, and clear the nation of the evil
11 that has implanted itself to restore justice and
12 wake up all that must be to the true threats of
13 evil that are being directed against freedom and
14 individual liberty; such as executing the correct
15 executive actions, the firing and replacement of
16 those who are not taking the correct stance for
17 truth, and are unwilling to take the necessary
18 steps to defeat the evil and clean up the
19 government; or who by their own ignorance and
20 compromise are giving the President false,
21 misleading advice, that would lead to the
22 compromise of your judgments and actions and allow
23 evil to remain.

24 The clearing of compromised forces against
25 the President and Vice President and their staffs

1 and family, protection and security staffs, the
2 military, and all who are opposing God's will or
3 leaving the door open to further compromise the
4 absolute exposure of the fraud and compromise, and
5 the responsible individuals behind it who must be
6 removed from their current post, and replaced with
7 those who must be there.

8 Our ratification of all divine judgments
9 that have been made upon the seed of the wicked
10 and by this our petition prayer, the request for
11 the stripping of the forces of darkness, entities,
12 demonic and satanic forces, energy veils and
13 protection afforded by dark forces that surround
14 the evil doers and cause them to slip through
15 without their evil behaviors being properly dealt
16 with and put in check.

17 Your divine judgments upon the following:
18 Those who are compromised in their support of the
19 constitution and have been shown to have made
20 malicious seditious acts, decisions and judgments
21 against the divine plan for America, and the
22 spirit and letter of your laws and constitution,
23 including but not limited to Chief Justice John
24 Roberts, Hillary and William Clinton, Nancy
25 Pelosi, and all legislators who have compromised

1 their standings and are opposing the divine plan
2 for America, in both houses of Congress and
3 Senate. And Judge Emmett Sullivan, Judge Biden,
4 Hiden -- Hunter Biden and the Biden crime family.
5 All those who have committed U.S. constitutional
6 violations knowingly and with mal-intent, such as
7 states governors, election boards, and others who
8 have changed election rules in an effort to
9 introduce and support fraud, sedition, the theft
10 of the election, and to override their respective
11 state legislators, such as but not limited to, the
12 passing of rules to use -- to use illegal mail-in
13 ballots and extension of vote counts beyond the
14 days of election.

15 All judges, prosecutors, district
16 attorneys, and others who are part of the judicial
17 system, who have compromised the letter and spirit
18 of the law, those responsible for the fraud and
19 criminal activities that had been discovered in
20 the 2020 elections; especially in the so-called
21 swing states Nevada, Arizona, Pennsylvania,
22 Michigan, Wisconsin, North Carolina, and Georgia.

23 Those who are misinformed and are giving
24 bad and dangerous advice to the President, and are
25 disrespectful to the office of the President,

1 you're overshadowing a direct intervention to help
2 Donald Trump to have the strength, resolve,
3 determination, to stand up against the forces
4 against him and to fully consciously understand
5 his responsibilities and the actions that must be
6 taken and to directly guide him to take those
7 immediate and correct steps to protect America for
8 your will to be made manifest, through direct
9 divine counseling; and if it's your will, direct
10 visitation and to surround him with the right
11 individuals to assist.

12 Your immediate intervention to
13 expeditiously remove those from the White House
14 staffs, who are working against America and those
15 who should not be there and are compromised or
16 weak, who are spreading lies and leaking to the
17 press, such as Pat Cipollone, Mark Meadows. The
18 replacement of the staff in the White House and
19 surrounding the President who are not supporting
20 the will of God with those patriots who need to be
21 there. Your divine justice to be served upon the
22 media, those complicit in keeping inaccurate
23 narrative alive about the elections, and who are
24 responsible for the spreading of discord and
25 unrest among the citizens.

1 Your divine justice to stop the
2 intervention of communist China and Russia into
3 the affairs of America; and especially the
4 involvement in the election of 2020. The
5 all-seeing eye of God to continue to expose the
6 voter fraud, vote manipulations, criminal
7 structures that are in place, the methods, the
8 people involved, and funding sources behind the
9 fraudulent manipulation that's taken place in the
10 2020 presidential election.

11 And the clearing of all illuminati,
12 Luciferian, satanic manipulation of the people,
13 the courts, lawyers, judges, and others of all
14 treachery and intrigue, lawlessness and opposition
15 to the constitution as a divinely inspired
16 document, and compromise to the truth regarding
17 who actually won the 2020 election.

18 And we ask that no light to be given
19 unlawfully unauthorized to any part of life,
20 whether it's not the commitment under the soul
21 salvation under the worship of our God. And we
22 also agree together for the absolute God
23 protection from the backlash from the forces of
24 darkness by this prayer and the subsequent release
25 of light into these situations.

1 And so we ask for your cloaks of
2 invisibility and vulnerability and visibility and
3 protection to be upon us, our loved ones, and
4 those to whom we are spiritually tied, and as far
5 as the forces of darkness are concerned.

6 Let this prayer be adjusted according to
7 God's holy will. Nevertheless, (inaudible) our
8 wills but thine be done. Amen.

9 PATRICK BYRNE: Amen, and amen.

10 DR. CORSI: Amen. And look, generations of
11 children about to be born and yet to be born
12 depend on us doing the right thing here.

13 PATRICK BYRNE: If the lights go out
14 here -- if the lights go out in America, and you
15 know the world knows this, don't believe -- you
16 know, in France a protest at the American Embassy
17 is just a cheap date. The world knows what
18 America is about, and what we stand for.

19 If the light -- they are counting on us,
20 free people and people who aspire to freedom
21 around the world are counting on you to do the
22 right thing, America. The lights go out here,
23 they go out throughout the world.

24 ARTHUR: That's true.

25 DR. CORSI: And look, this is -- I've

1 decided, I'm selling all my books at -- the back
2 -- the -- all the books I've -- Corsi Nation now
3 that I've written, I have all my author's copies
4 -- I'm not -- I'm going -- I'm going to make some
5 decisions as to what I'm going to do next in my
6 life, but I know I'm going to fight this battle.

7 JIM: May I -- may I throw one more
8 dimension on this? I wasn't going to touch --

9 DR. CORSI: Sure. Please.

10 PATRICK BYRNE: -- but -- China. Now I
11 want to say that I love China. I grew up thinking
12 myself as a reincarnation of a Chinese Shaolin
13 monk. I may have just watched too many Bruce Lee
14 movies as a kid, but my undergraduate degree was
15 philosophy and Chinese studies. I speak Chinese.
16 I was a student -- the first time they opened up
17 in '83-'84 to foreign students from the West, I
18 was there for -- I spent a year -- over a year,
19 I've -- how can I put it? I -- it's -- so I have
20 this great affection.

21 I -- there's an old saying some journalist
22 100 years ago that said the difference between a
23 Russian and a Chinese, when it comes to America,
24 is when Americans meet a Russian we don't love
25 each other, but when we meet Chinese, we love each

1 other.

2 I'm Irish. The Chinese and the Irish built
3 the railroad. So all that said, what's going on
4 here is this, since you touched on it, there has
5 been for 15 years -- well, there's a book called
6 the 100 Year Marathon by Michael Pillsbury. You
7 know that book, Dr. Corsi?

8 DR. CORSI: Yes, I know -- I know it quite
9 well. Yes.

10 PATRICK BYRNE: And that's true. In 1949
11 the Chinese -- the Maoism took -- it started a
12 100-year plan to take us down. And in 2015,
13 Michael Pillsbury, a lifelong dove, China dove,
14 wrote a book that said: I've been wrong my whole
15 life, the Chinese have this 100-year plan, they're
16 66 years into it, but they're running 20 years
17 ahead of schedule and they're going to take us
18 down.

19 For 15 years now the Chinese national
20 security literature has included references to an
21 Assassin's Mace, Shah Shoujin, the (inaudible) --
22 the mace of the assassin, the club of the
23 assassin. And it's a reference to an old Chinese
24 story about two kingdoms who where going to go to
25 war, but the king of one gets a -- an assassin

1 next to the king of the other; and with one
2 stroke, takes him out. And there doesn't have to
3 be a war. One kingdom takes over the other.

4 For a dozen years or more, the Chinese
5 literature has referred to a coming (inaudible),
6 the Assassin's Mace. We've -- (inaudible) side
7 has been wondering what is this? We thought we
8 were friends. We thought we were trying to help
9 them and stand up and -- and be our partner, and
10 create a new civil -- you know, world.

11 That -- that -- the question has been what
12 is the mace; is it their new aircraft carrier?
13 Their stealth planes? Their ballistic missiles
14 that can take out a ship? The hypersonic that --
15 I think that what we are experiencing is the
16 Assassin's Mace. This is it. It's very Chinese
17 to win a war without even having to fight.

18 What we're experiencing is a -- is a China
19 -- is the Chinese -- what we're going through
20 right now is a (inaudible), as I'm sure you've
21 come to understand about Covid and stuff like
22 that, the hand of China is behind this, this
23 rigged election, as Iran and China -- who
24 incidentally are like that -- involved.

25 We have absolutely clear computer forensic

1 evidence that they have been accessing our
2 election equipment during the election and the
3 voting, and the -- so you are experiencing the --
4 the Chinese assassin's mace. And that's -- that's
5 -- this very strange year that America -- you've
6 been living through.

7 So you bend a knee to need to this, you're
8 -- you know, they'll be harvesting your organs
9 before -- you know, your -- you know, before the
10 decade is out, they'll be -- they'll be -- what
11 they have going on in China, they'll be going on
12 here.

13 It's going to start with you, Corsi.

14 DR. CORSI: Well, look, here's where we --
15 fine, then let it be. Bring it on. Let's duke it
16 out. I'm ready.

17 PATRICK BYRNE: In (inaudible) --

18 DR. CORSI: Let's duke it out. And you
19 know, I'm going to sell these books, get people --
20 give them collectors' signatures. And I'm going
21 to do -- with the rest of my life here, whatever
22 is next. I have no idea what that is at the
23 moment. But I know right now it doesn't matter.
24 I'm going -- these guys want to duke it out, let's
25 duke it out. I've done it before. I duked it out

1 with Mueller. Mueller lost.

2 PATRICK BYRNE: You know, I saw you on
3 television that year or two ago, and I just loved
4 the way you spoke, that you're just not going to
5 bear false witness against somebody because you're
6 not the kind of man who bears false witness; and
7 you'll take life in prison rather than that. And
8 I thought, gee, that's a man after my own --
9 that's a Thomas Moore. That's a --

10 DR. CORSI: Well, I -- I -- I greatly
11 appreciate you saying that; but -- you know, the
12 -- I'm not here for an earthly reward. When I
13 face the throne of God, I have -- I'm going to
14 answer only one question that God -- were you a
15 faithful servant? And that's -- that's the only
16 point of being alive.

17 PATRICK BYRNE: Correct. We figured the
18 same things out.

19 DR. CORSI: Figured the same things out.
20 You and I are a lot like in that regard. And
21 we're going to do some more together. We'll have
22 a conversation after this. We'll set some things
23 up. I want you to bring in your experts. We'll
24 do -- we'll do the prosecutions right here.

25 PATRICK BYRNE: I would love to start --

1 DR. CORSI: Sidney Pow- -- I'll -- Sidney
2 Powell can be special counselor right here. Rudy
3 Giuliani and General Flynn, right here, we'll give
4 them a platform and we'll organize it and -- and
5 whatever you -- however you kind of organize it
6 with these people is how we'll do it, Patrick.

7 PATRICK BYRNE: Okay. I'll text them as
8 soon as I get off the phone.

9 DR. CORSI: Okay. Last comments. Craig,
10 any comments you have on all this?

11 CRAIG: Yes. As we have been ending almost
12 every program for the last month, is fear not,
13 stand strong, and remain united. Arthur?

14 ARTHUR: And these spiritual petitions,
15 like the one I just gave, are up on the prayerful
16 patriot -- go to the featured agreement prayer on
17 the -- on the front page, and then you can see how
18 all this is done and construct your own. We got
19 to keep the prayer up. It's incredibly important.
20 Dr. Corsi?

21 DR. CORSI: It's incredibly important,
22 because we got to -- we got to beseech God to --
23 repent that we let the country get to this point.
24 And we ask his forgiveness and we ask for his
25 divine intervention.

1 CRAIG: Agent X?

2 DR. CORSI: Wait a second. It's time for
3 Michael the archangel -- there's evidently moments

4 --

5 ARTHUR: Yes.

6 DR. CORSI: Take that mighty sword and
7 let's clean -- let's get some justice here, and
8 let the -- let the angels, the archangels, get out
9 and get involved and do their thing; and we'll
10 stand by and let them -- we'll watch and we'll --

11 PATRICK BYRNE: No justice, no peace. No
12 justice, no peace.

13 CRAIG: There it is.

14 DR. CORSI: And -- you know, this is one we
15 can win and we're going to win, because it is
16 still we the people.

17 JIM: Right on. Right on.

18 DR. CORSI: And that's why -- getting out
19 in the streets, getting out in the caravans,
20 getting out for Donald Trump. It's not a time to
21 feel afraid or feel that these people saying take
22 a knee and -- you know, you're going to have to
23 get on the helicopter and leave and do it with
24 grace and dignity, we'll give you a -- a gold
25 watch when you leave. Forget all that nonsense.

1 PATRICK BYRNE: It's a perp walk. If he
2 walks to the helicopter now, without -- without
3 getting to the bottom of this, it's a perp walk.

4 DR. CORSI: And we're not going to do that.

5 PATRICK BYRNE: We're not going to
6 (inaudible) --

7 DR. CORSI: -- tell them -- we're not going
8 to tell him no, we're telling him hell no.

9 PATRICK BYRNE: No justice, no peace. No
10 justice, no peace.

11 DR. CORSI: It's like I said, I'm not --
12 I'm not signing that damn piece of paper. I'm not
13 -- I'm not going to stand in front of God, my hand
14 on the bible, swear to a crime I didn't commit;
15 and that will make your case against Donald Trump
16 -- just go ahead and put me in prison the rest of
17 my life. Saint Paul, evangelized the prison and
18 he wrote a couple of books. I could probably do
19 that.

20 Agent X, anything you got to say?

21 AGENT X: Yeah, I -- I agree with what
22 Patrick is saying about China. I mean -- you
23 know, I -- we've always heard that we engaged
24 China, even though we didn't like everything they
25 did, but that we were going to make them more like

1 us. And I think what's happened is, they've made
2 us more like them. And I think it's a very
3 dangerous time in our -- in our society.

4 And -- you know, a lot of people are
5 watching these videos and watching other videos
6 and -- and trying to be educated, and I think also
7 now is the time to take action; and it's hard for
8 people at this point in time to say what can I do.
9 And the best thing that anybody watching this
10 video can do is share this information with other
11 people, share these videos that -- that you're
12 publishing. We're putting together these short
13 videos that are more digestible. And also we have
14 petitions on your website that people can sign,
15 send in from -- you know, send e-mails and -- and
16 posts to -- to your -- your people in Congress,
17 and this President and Senate about taking action.

18 So there are things that -- that everybody
19 can do to take action. Showing up in D.C. on
20 January 4th through the 6th, that's something we
21 can do. And if your country's worse --

22 SPEAKER: (Inaudible) --

23 PATRICK BYRNE: Come, you have to do that.
24 Come to Washington January 4th through the 6th.
25 We want millions of people showing up and showing

1 these weasels in Congress we're not cool with
2 them, they have -- we are not -- we are not going
3 to bend a knee to a rigged election. We're not
4 Venezuelans. We're not, you know, Hungarians who
5 were forced to do this kind of stuff in -- in '56
6 and in '45 and -- and we're (inaudible) '46.
7 We're not -- we don't -- Americans do not bend a
8 knee to this kind of thing.

9 AGENT X: And this isn't just an election,
10 right? The reason the Venezuelans and Cubans are
11 so passionate about this is they've seen this --
12 this -- this played out before.

13 PATRICK BYRNE: Right.

14 AGENT X: So -- so, you know, tomorrow is
15 Christmas, and then in -- on December 25th in
16 1776, Washington crossed the -- the Delaware.

17 PATRICK BYRNE: Yeah. We can get our ass
18 off the couch and come and do a protest.
19 Washington crossed the Delaware -- you're right,
20 it was -- it was the night, right? It was
21 tonight, was it not?

22 CRAIG: Yes, it was.

23 AGENT X: I just looked it up, it was the
24 25th, it said. And Wikipedia, at least -- but
25 Wikipedia isn't always correct.

1 DR. CORSI: I'll get the book out and read
2 it tomorrow. It was a Christmas night, they came
3 across on Christmas night.

4 PATRICK BYRNE: To Trent?

5 DR. CORSI: To Trenton. Trenton, New
6 Jersey.

7 DR. CORSI: That was a turning point in --

8 PATRICK BYRNE: (Inaudible) six miles away
9 and marched through the snow.

10 CRAIG: Yep. Destroyed the Hessians.

11 DR. CORSI: It was a turning point in the
12 war. Up until then Washington had been losing, he
13 did a campaign through New Jersey, where I live
14 now, and to Princeton, and beat the -- beat the
15 British, and that was the turning point in the
16 war.

17 PATRICK BYRNE: Jerome, you get me five
18 minutes with the President on the phone, I can
19 tell him something that blows up a cover-up.

20 DR. CORSI: Okay.

21 PATRICK BYRNE: We're ready (inaudible) --

22 DR. CORSI: We're going to get that done.
23 So you -- you and I are going to talk when we're
24 finished with this, and we'll figure out -- we'll
25 go get this done.

1 PATRICK BYRNE: Thank you, sir.

2 DR. CORSI: And -- and we'll get all the
3 other things we've talked about here done, too.
4 We're going to have more programs. We'll -- we've
5 got Jesus Christ celebration of his birth right
6 now, and we got the Christmas star in the skies.
7 We've got everything we need here to win, so let's
8 just go ahead and get it done.

9 PATRICK BYRNE: Put it on.

10 DR. CORSI: God bless you all. Thank you
11 for joining us. We'll be back. We may even do a
12 show tomorrow, I'm not sure yet. Talk with
13 everybody and see what we're doing, but we'll keep
14 going. And Merry Christmas to all. Celebrate.
15 Be sure to get down on your knees and thank God
16 for Christmas and for Jesus Christ our Lord and
17 Savior.

18 And in the end, God always wins. God will
19 win here, too. And Donald Trump will be
20 re-elected.

21 This is Jerome Corsi, and it's been a
22 really historic broadcast today. Patrick Byrne
23 has joined us, and will be back with us many
24 times.

25 Arthur, thank you for the prayers.

1 ARTHUR: Thank you.

2 DR. CORSI: Craig, thank you for producing.

3 And Agent X, I suspect we'll be doing some more
4 planning and having some more fun over the coming
5 days. I can't wait.

6 God bless. And -- and in the end, God
7 always wins. Today is -- today's a wonderful day,
8 we get to celebrate our savior's birth. God
9 bless.

10 JIM: Amen.

11 PATRICK BYRNE: (Inaudible) victory,
12 everyone.

13 (End of the recording.)

14

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December 24, 2020

106

1 CERTIFICATE

2

3 I, Jackie Mentecky, Transcriptionist/Court

4 Reporter, do hereby certify that I was authorized to

5 transcribe the foregoing recorded proceeding, and that

6 the transcript is a true and accurate transcription of my

7 shorthand notes to the best of my ability taken while

8 listening to the provided recording.

9

10 Dated this 5th day of January, 2021.

11

12

13

14

15

16

Jackie Mentecky

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Investigations

For Trump advocate Sidney Powell, a playbook steeped in conspiracy theories



Attorney Sidney Powell speaks during a news conference about lawsuits contesting the results of the presidential election at the Republican National Committee headquarters in Washington, D.C., on Nov. 4. (Sarah Silkey for The Washington Post)



Attorney Sidney Powell speaks during a news conference about lawsuits contesting the results of the presidential election at the Republican National Committee headquarters in Washington, D.C., on Nov. 19. (Sarah Silbiger for The Washington Post)

By **Aaron C. Davis**, **Josh Dawsey**, **Emma Brown** and **Jon Swaine**

November 28, 2020 at 10:32 p.m. GMT

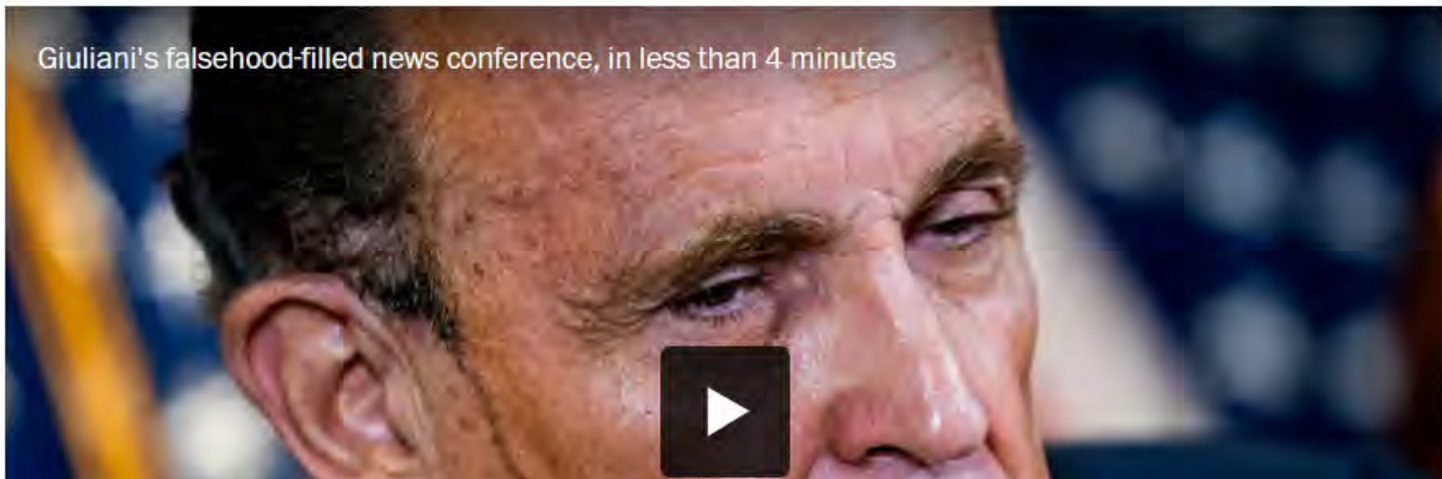
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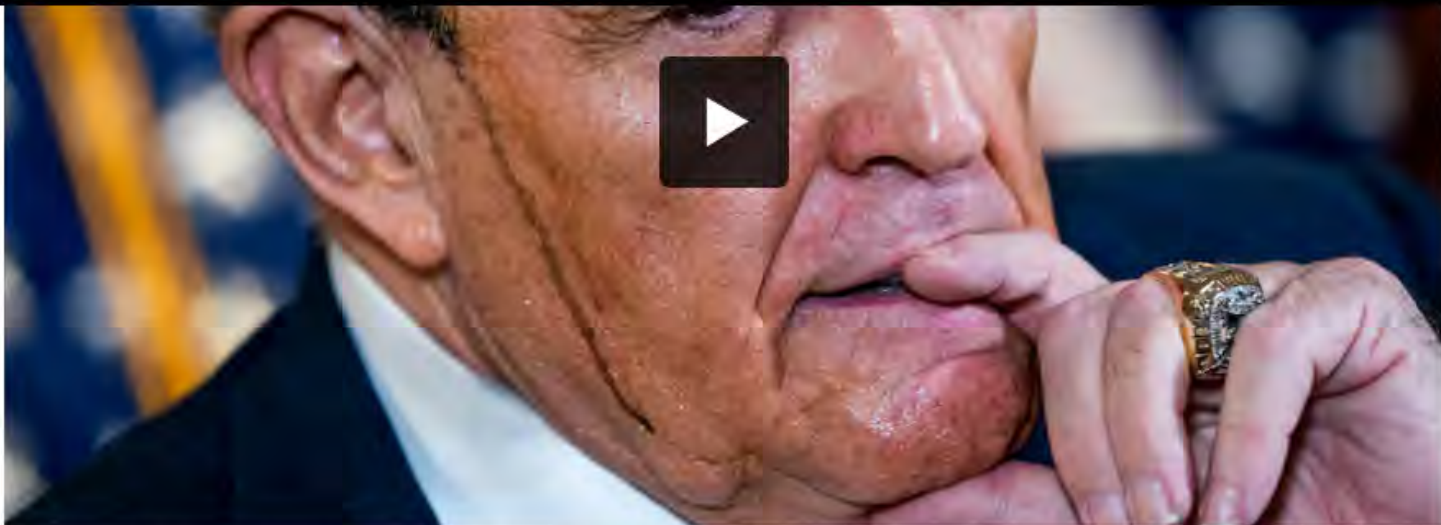
She zipped through classes at the University of North Carolina, earning her diploma in less than two years. She added a law degree and in her early 20s became, she has often said, the youngest federal prosecutor in the country. And when Sidney Powell — then a Democrat — moved into private practice, she co-wrote a paper hailed as a “manual” for deciphering sometimes-arcane appellate rules, salting in advice for fellow attorneys: Never “slant” the truth to benefit a client. “To write anything less than an accurate statement of facts can cost an attorney credibility with the court,” she wrote.

Fast forward two decades — through a bitter case she says shook her faith in the U.S. justice system — and there was Powell at a lectern at the headquarters of the Republican National Committee, introduced as an attorney representing President Trump.

At the Nov. 19 [news conference](#), before a national television audience, she asserted that “communist money,” the late Venezuelan president Hugo Chávez and a manipulated computer algorithm were all connected in a secret plot that had altered potentially millions of ballots and stolen the election from Trump.

Giuliani's falsehood-filled news conference, in less than 4 minutes





Trump campaign lawyer Rudolph W. Giuliani claimed Nov. 19 that President Trump lost the election because of a baseless conspiracy theory. (The Washington Post)

Powell did not stop there. In an interview two days later with the conservative outlet Newsmax, she said she had been given evidence — which she said she could not disclose — that Georgia Gov. Brian Kemp, a Republican and an ally of the president, had taken bribes and conspired to orchestrate Trump's defeat. Nationwide, she estimated that “thousands” of local elections officials knowingly helped carry out the master scheme to tamper with ballots. In fact, Powell claimed, if anyone bothered to look, they'd probably find that U.S. elections had been rigged for decades.



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In important places, the headspinning allegations did not land well.

Trump watched from the White House as his usual cast of sympathetic proxies — including [Fox News's Tucker Carlson](#) and former New Jersey governor Chris Christie — turned on Powell, according to an official familiar with the events, who like others interviewed for this report spoke

Trump watched from the White House as his usual cast of sympathetic proxies — including [Fox News's Tucker Carlson](#) and former New Jersey governor Chris Christie — turned on Powell, according to an official familiar with the events, who like others interviewed for this report spoke on the condition of anonymity to describe confidential or private interactions at the White House and at Trump's campaign offices. On ABC's Sunday talk show, Christie said Powell's comments had tipped the president's legal efforts to challenge the outcome of the election into a "[national embarrassment](#)."

In calls to the White House, several GOP senators warned that Powell seemed unhinged, two officials said.

Powell, at least for the time being, had gone too far.



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On Nov. 22, two of the president's attorneys, Rudolph W. Giuliani and Jenna Ellis, issued a statement saying that Powell was, in fact, not representing Trump — a remark that was true in that Powell had not yet been paid by the campaign, Trump campaign officials said and Powell has acknowledged.

For Powell, however, the banishment became not a defeat but a new opportunity, one mirroring and supported by Trump's continued [refusal to concede](#) and by his insistence that the results are fraudulent.

Powell has remained a leading purveyor of outlandish allegations about the election, at a time when

and supported by Trump's continued refusal to concede and by his insistence that the results are fraudulent.

Powell has remained a leading purveyor of outlandish allegations about the election, at a time when polls show that the great majority of Trump voters do not believe Democrat Joe Biden was the legitimate winner. In alleging broad conspiracies and questioning the motives and actions of multiple government institutions and officials, she has followed a playbook she has drawn from in the past.

As Powell pressed claims that the election was stolen from Trump, the president on Wednesday pardoned her most famous client, former national security adviser Michael Flynn. Powell also launched a fundraising effort that she said would support her work to expose fraud in the election, writing online that "millions of dollars must be raised to defend the Republic."



Former national security adviser Michael Flynn leaves the federal courthouse with his lawyer, Powell, in 2019. (Manuel Balce Ceneta/AP)

Former national security adviser Michael Flynn leaves the federal courthouse with his lawyer, Powell, in 2019. (Manuel Balce Ceneta/AP)

Almost immediately after the Trump team distanced itself from her, some of Powell's supporters began suggesting on social media that the move might have been a ploy to give her the leeway to be more aggressive in court. That idea spread quickly, particularly among followers of the QAnon movement, whose absurd beliefs include that Trump and his allies are preparing to vanquish a cabal of "deep state" child abusers and Satan-worshipping Democrats.



AD

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"Be patient, there is a strategy," came a [message](#) on Monday from an account that frequently posts QAnon theories. "Sidney is working for WeThePeople. WeThePeople who seek reelection of The president."

On Tuesday evening, Trump himself signaled renewed interest in Powell's claims. He [retweeted](#) an interview in which Powell told Fox's Lou Dobbs that software made by the company [Dominion Voting Systems](#) and used in 28 states had been designed to allow Chávez to manipulate election results in Venezuela, a discredited claim. The president also retweeted a [message](#) in which conservative Georgia attorney Lin Wood said Powell would file suit Wednesday laying out new evidence of voter fraud in Georgia. "Enemies of America will deny its allegations. Do NOT believe them. Believe Sidney & me. We love America & freedom. Our enemies do not," Wood wrote.

After Powell posted a typo-ridden draft of the complaint on her website close to midnight on Wednesday, Trump on Thanksgiving retweeted a conservative podcaster saying the suit would seek

them. Believe Sidney & me. We love America & freedom. Our enemies do not," Wood wrote.

After Powell posted a typo-ridden draft of the complaint on her website close to midnight on Wednesday, Trump on Thanksgiving retweeted a conservative podcaster saying the suit would seek to make Georgia declare Trump the winner of the state. The filing, which became available Friday on the court's website, showed the complaint to the U.S. "District Court, Northern District of Georgia" alleges "ballot-stuffing" through manipulation of Dominion's electronic voting systems that is "virtually invisible."



Do Not Forget 2020 Benefits

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The 104-page filing — signed by Powell, Wood and two other attorneys — names Georgia's governor, its secretary of state and elections officials and makes at least a dozen previously disputed or [debunked claims](#) about lax security of Dominion's machines, its ownership and alleged foreign entanglements. Among them is that the company was "founded by foreign oligarchs and dictators to ensure computerized ballot-stuffing and vote manipulation to whatever level was needed" to keep Chávez in power for life.

No hearings in the case have yet been scheduled, but on Thanksgiving, Denver-based Dominion released a blistering [15-point rebuttal](#), calling the lawsuit malicious and a "bizarre election fraud conspiracy" that is "baseless, senseless, physically impossible, and unsupported by any evidence whatsoever."

"Dominion was not 'founded by oligarchs and dictators.' It was founded in Toronto, Canada, and it is now a proud nonpartisan American company," the company said, adding that no single company in the American electoral systems could surreptitiously change votes as Powell alleged. Such a plot

“Dominion was not ‘founded by oligarchs and dictators.’ It was founded in Toronto, Canada, and it is now a proud nonpartisan American company,” the company said, adding that no single company in the American electoral systems could surreptitiously change votes as Powell alleged. Such a plot would require “collaboration of thousands” of Republicans, Democrats, poll workers, auditors and contractors that support state information technology and voting systems.

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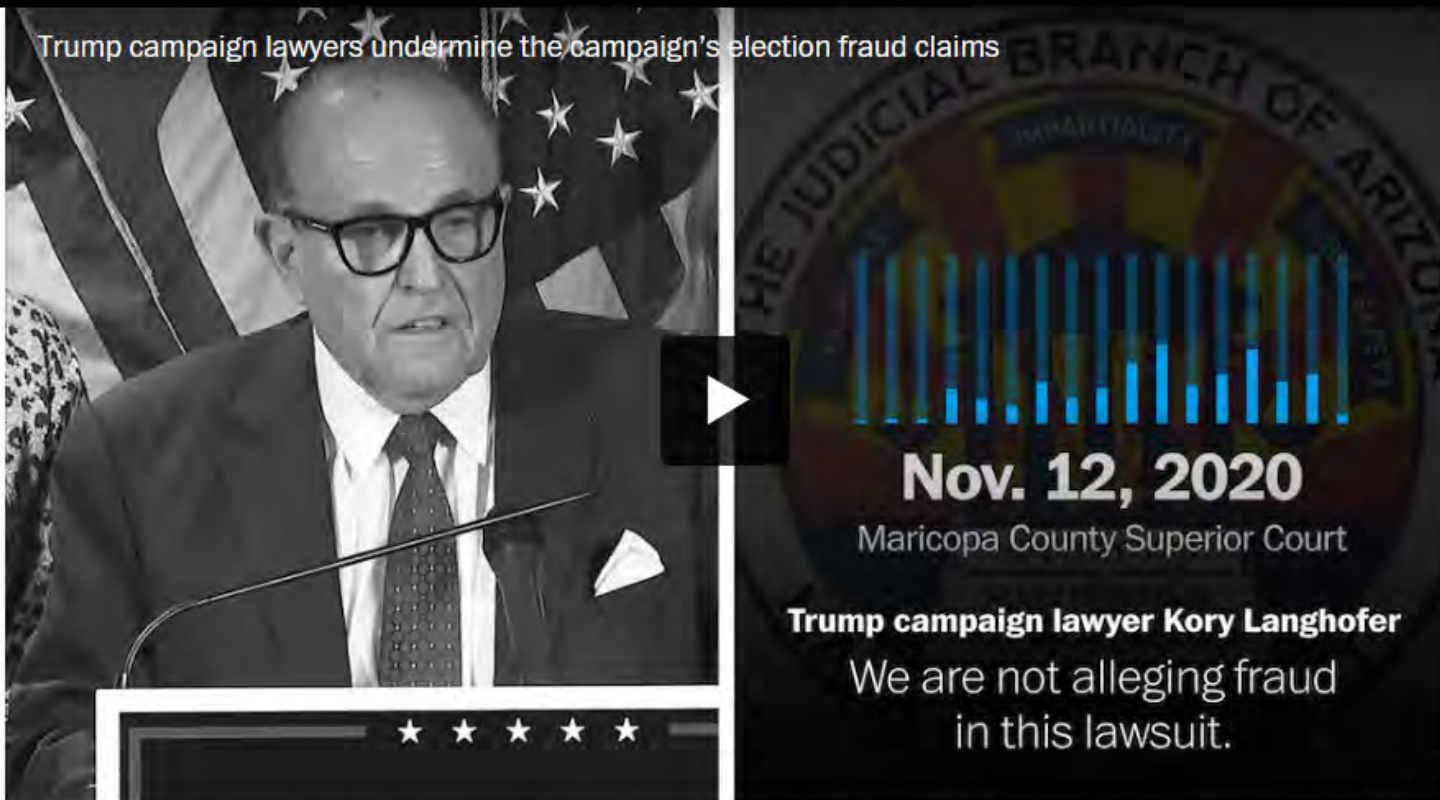
“It is important to understand that this is not possible — not on a machine-by-machine basis, not by alleged hacking, not by manipulating software, and not by imagined ways of ‘sending’ votes to overseas locations,” Dominion said, noting that its devices create an auditable paper trail of every vote cast in Georgia. “Georgia handcounts, independent audits, and machine tests have all *repeatedly* affirmed that the machine counts were accurate.”

The lawsuit was much anticipated on the right — Powell had said that it and her other court filings would “release the kraken,” a reference to a mythical sea monster that quickly went viral. Online, supporters had a ready explanation for the typos and other errors: They were intentional and meant to draw media attention to the complaint.

Powell did not respond to phone and text messages seeking comment for this story.



Trump campaign lawyers undermine the campaign's election fraud claims



Since the election, the Trump campaign has repeatedly alleged widespread fraud in the 2020 election. In court, his lawyers say the opposite. (The Washington Post)

Virginia-based lawyer Jesse Binnall, who has worked with Powell on the Flynn case and is challenging election results for the Trump campaign in Nevada, said that it is “because of her tenacity and her courage that the truth ultimately came out in the Flynn case and will ultimately come out here.”



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Flynn, who had pleaded guilty to lying to the FBI, was pardoned, not acquitted. The Supreme Court has [ruled](#) that accepting a pardon is akin to an admission of guilt.

'A fine young lawyer'

Powell, 65, grew up in Raleigh, N.C., where her father worked for GMAC, the finance arm of General Motors. Powell has said she was an avid “Perry Mason” viewer and wanted to be a lawyer by the fourth grade. At Needham Broughton High School, she made the National Honor Society and was listed in “Who’s Who” of high-achieving seniors.

Powell became known as a young woman in a hurry. In 1979, after she had completed a bachelor’s degree at the University of North Carolina in just 21 months and swiftly passed through UNC’s law school, a local newspaper illustrated a story on her with a cartoon of Powell racing across the graduation day stage in a high-speed blur, her cap trailing behind.



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This car gadget can restore any blurry and dirty headlight and shine like brand new.

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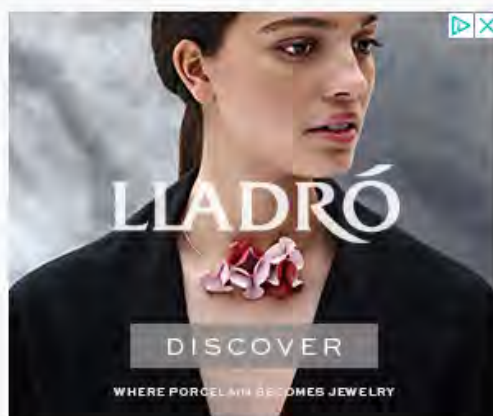
At the age of 23, Powell was hired as an assistant U.S. attorney in San Antonio, a distinction she has many times said made her then the youngest federal prosecutor in the country.

She joined an office that was under siege after taking on the region’s major drug traffickers. Weeks before Powell was sworn in, another assistant U.S. attorney survived an assassination attempt; a few months later, a judge was murdered. Several of Powell’s new colleagues were under protection

She joined an office that was under siege after taking on the region's major drug traffickers. Weeks before Powell was sworn in, another assistant U.S. attorney survived an assassination attempt; a few months later, a judge was murdered. Several of Powell's new colleagues were under protection by U.S. marshals.

Sue Boyd, whose husband, Jamie, was the U.S. attorney when Powell joined, said she had fond memories of Powell visiting their apartment to discuss cases with her boss, including their successful prosecution of drug kingpin Jamiel "Jimmy" Chagra.

Boyd said she has been shocked by Powell's recent turn to extreme views and conspiracy theories. "This is not the Sidney I knew," said Boyd. "I remember a fine young lawyer and a responsible person."



Powell moved to the Northern District of Texas, based in Dallas, and according to a biography on her firm's website began an appellate section for the prosecutor's office.

After a decade at the Justice Department, Powell took a job at Dallas white-shoe firm Strasburger & Price. She then set up her own boutique appellate outfit, with addresses in Dallas and Asheville, N.C. By 1989, Powell was president of the bar association for the Fifth Circuit in New Orleans.

In the mid-1990s, Powell got engaged to Roger K. Parsons, a Texas physicist, who hired her for legal representation after the death of his wife in a plane crash in Malaysia. Powell helped Parsons file malpractice claims against lawyers who had won him more than \$4 million in damages from

In the mid-1990s, Powell got engaged to Roger K. Parsons, a Texas physicist, who hired her for legal representation after the death of his wife in a plane crash in Malaysia. Powell helped Parsons file malpractice claims against lawyers who had won him more than \$4 million in damages from the plane's owners, arguing that he should have been entitled to more, court filings show.

Windle Turley, an attorney Parsons sued unsuccessfully, said Powell appeared to advise Parsons poorly as the widower embarked on a years-long legal campaign that has alleged conspiracy theories and coverups related to the crash.

"It's unfortunate that any lawyer would not see that Parsons needed help other than legal assistance," Turley said in an interview.

Parsons rejected Turley's remarks, saying in an email that his lawsuits were well founded and that Turley was not "in a position to be directing anyone's need for counseling, legal or otherwise."

Yet Parsons also said that Powell had changed since they broke off their engagement. "The Sidney Powell I knew then, like me, believed that a case justified by the facts and the law should most times succeed before a jury and judge," he said. "I do not know the Sidney Powell I saw representing the Trump campaign."

Powell was married and divorced twice between 1980 and 1995 and has a son who now works as a financial consultant.

In the early 2000s, Powell listed her state of residence as North Carolina. While there, she registered as a Democrat, records show. In 2005, she moved her registration to Texas, where voters do not declare a party affiliation. In 2007, she donated \$1,000 to the presidential primary campaign of former senator John Edwards (D-N.C.).





Standing with his lawyers, former Merrill Lynch executive James A. Brown lights a cigarette after leaving federal court in Houston in 2005, where he was sentenced to 46 months for his participation in Enron's bogus sale of power barges to the brokerage. (Michael Stravato/AP)

Scarred by Enron case

It was in Texas — four years into a wave of prosecutions, lawsuits and appeals stemming from the 2001 bankruptcy of energy giant Enron Corp. — where Powell took on a case she would later say shook her view of the U.S. justice system.

Her client, James A. Brown, an executive of Merrill Lynch & Co., had been found guilty of several crimes in a complicated side chapter of the bankruptcy, one centered around Enron's sale of its stake in Nigerian energy barges to the New York bank.

In 2006, after a year working his appeal, Powell and other lawyers successfully argued that the Fifth Circuit should overturn Merrill executives' convictions on conspiracy and wire fraud charges. The appeals court let stand Brown's convictions on perjury and obstruction. Brown did not respond to messages seeking comment for this story.

Fifth Circuit should overturn Merrin executives' convictions on conspiracy and wire fraud charges. The appeals court let stand Brown's convictions on perjury and obstruction. Brown did not respond to messages seeking comment for this story.

Powell returned to the lower court to seek a new trial on those charges, arguing that new evidence had come to light and that her client had been the victim of "egregious" prosecutorial misconduct.

In 2010, Judge Ewing Werlein Jr. of the Southern District of Texas rejected Powell's argument. In a detailed 63-page decision, Werlein noted that out of a huge amount of materials presented in court, Powell's attempt to argue her position was based on "excerpted pieces, phrases, and out-of-context passages."

Powell appealed that decision to the Fifth Circuit as well. She claimed that prosecutors failed to disclose evidence that would have buttressed Brown's defense if his lawyers had known about it.

A three-judge panel on the Fifth Circuit found that federal prosecutors had turned over much of the evidence in question to Werlein, the trial judge, to determine whether it needed to be provided to Brown's lawyers. Werlein had ruled it did not, and said summaries of the evidence would suffice.

In a unanimous ruling, the panel found that some of the prosecutors' raw notes contained favorable information for Brown but upheld Werlein's decision, saying the information would not have had a meaningful impact on his defense.

The appeals court found that there was ample evidence of Brown's guilt.

Powell continued filing ethics complaints against members of DOJ's Enron Task Force. Among them was Andrew Weissmann, who by then was general counsel to the FBI. The complaint against him was ultimately dismissed, Powell later wrote.

In Powell's view, the lack of repercussions for Weissmann and others was evidence that the justice system was fundamentally broken and could not be trusted to police itself.

In 2014, she published the book "Licensed to Lie," which argued that ambitious, aggressive federal prosecutors have been allowed to break the law with impunity and run roughshod over the rights of individuals and businesses.

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“The prosecutors truly responsible for these injustices are not only unscathed but flourishing,” Powell wrote. “Until these prosecutors are convicted in the court of public opinion, or disbarred, these very powerful and politically connected lawyers are still licensed to lie.”

Weissmann, who was soon to become chief of the fraud section within DOJ’s criminal division, was referenced nearly 100 times in the book. On a website she set up promoting the book, she took to describing him as “a true villain” of her tale.

The book gained purchase with conservatives. In 2015, then-Sen. Orrin G. Hatch (R-Utah) called it “powerful” during the Judiciary Committee confirmation hearing for Attorney General Loretta E. Lynch, and urged her to read it. “If even half of it is true,” Hatch said, “you have a lot of work to do to clean up the department.”

But Powell saw forces at work to keep the book from becoming a mainstream hit. In 2015, she said she believed the federal government and unnamed others were deliberately suppressing its sales.

Powell claimed that Barnes & Noble refused to stock it and Amazon labeled it sold out when copies were available. “The New York Times refused to review the book, even though some noted people wanted to write a review of it,” she told an interviewer from WZAB radio in Sweetwater, Fla. “The New York Post was going to publish an article about it, but reached out to Department of Justice for comment and all of a sudden pulled the article. Been no mention of it since. No way to get through to them.”

Powell kept writing, penning a series of opinion articles for the website of the New York Observer, which was at the time owned by Trump’s son-in-law, Jared Kushner. Some of Powell’s pieces targeted long-standing foes, including Weissmann and Lynch, while others castigated Hillary Clinton, Trump’s 2016 opponent, for her use of a private email server while she was secretary of state.

Clinton, Trump's 2016 opponent, for her use of a private email server while she was secretary of state.

Two former editors at the paper said Powell was brought on as a contributor by Ken Kurson, a close friend of Kushner's who was then the top editor. In a brief interview, Kurson confirmed that he personally edited Powell's copy.

"She pitched me an article and I liked it," Kurson said. "I didn't know her, and I don't believe she knew Jared."

Kushner did not respond to a message seeking comment.

Soon Powell would have a much bigger audience.

In May 2017, Deputy Attorney General Rod J. Rosenstein appointed former FBI director Robert S. Mueller III as special counsel to investigate alleged collusion between the Trump campaign and Russia. One of Mueller's first hires: Weissmann.

"#Mueller hiring out of my book! #Weissmann now," tweeted Powell, tagging President Trump, Ivanka Trump, Donald Trump Jr., Kushner and others

The following month, former House speaker Newt Gingrich tweeted: "Licensed to Lie: Exposing Corruption in the Department of Justice: by Sidney Powell is about to become a very important book-explains a lot."





Andrew Weissmann, one of the lawyers on the team convened by Robert S. Mueller III that investigated Trump's alleged ties to Russia, has long been a target of Sidney Powell's. (Jackie Molloy for The Washington Post)

Star turn

Powell and her book started getting more airtime on conservative radio and television, especially Fox News.

“Meet a woman named Sidney Powell,” Sean Hannity told his audience in November 2017. “She worked at the DOJ for a decade. She believes that one of Mueller’s top investigators, Andrew Weissmann, has a documented history of using strong-arm tactics to seek convictions, unethical behavior.”

Powell was ready when the camera turned to her.

“Andrew Weissmann is the poster boy for prosecutorial misconduct,” she said. He’s one of a “a corrupt cabal of former prosecutors and now current prosecutors again who are willing to do whatever it takes to achieve whatever they want to achieve.”

Weissmann declined to comment for this story and has not responded to her public attacks on him.

When Mueller’s office began indicting Trump allies in relation to the Russia probe, Powell appeared

Weissmann declined to comment for this story and has not responded to her public attacks on him.

When Mueller's office began indicting Trump allies in relation to the Russia probe, Powell appeared repeatedly on Fox News to argue that the prosecution was hollow. Trump regularly saw her arguments, officials said, and appreciated them, particularly on the show of his ally Lou Dobbs.

"Neither Mr. Mueller nor Andrew Weissmann are interested in the truth, whatsoever," she told Fox News host Mark Levin.

In November 2018, Powell spoke at a conference in Dallas organized to raise money for the legal defense fund for Flynn, who by then had pleaded guilty to lying to the FBI and agreed to cooperate with Mueller.

The event was billed as a "who's who of political leaders; each dedicating themselves to exposing the Deep State and supporting a great American patriot and hero."

Powell delivered a talk titled "Creeps on a Mission to Destroy the President," and she met with Flynn's sister and brother on the sidelines of the conference, [Politico reported](#).

After Powell took over Flynn's defense, in June 2019, the case became a legal roller coaster.





U.S. District Judge Emmet G. Sullivan, seen in 2009, was urged by Powell to drop former national security adviser Michael Flynn's case. (Dominic Bracco II for The Washington Post)

Over several months, Powell sought to have U.S. District Judge Emmet G. Sullivan toss Flynn's case, arguing misconduct by prosecutors and suggesting the government was going after Flynn to embarrass Trump. In January, Flynn asked to [withdraw his guilty plea](#), alleging prosecutors breached his cooperation agreement by demanding false testimony.

The government pushed back against motions seeking documents, arguing that Powell was demanding "a fishing expedition" to support her theories. Prosecutors also disclosed that Powell wrote to Attorney General William P. Barr in June 2019, asking in "utmost confidentiality" that he appoint an outsider to review Flynn's case, an examination she felt would lead to its dismissal.

Barr ultimately did as she suggested.

Powell wrote the letter — which disparaged prosecutors as well as Sullivan — on Flynn's behalf without notifying his then-defense attorneys.

In court, Sullivan described the letter as unusual and asked whether "it was ethical to write on behalf of someone you didn't represent." Powell replied that at the time she had begun representing Flynn and merely had not filed paperwork with the court reflecting that.

In the course of a hearing in September, Powell revealed that she had personally briefed the president on the case.

In the course of a hearing in September, Powell revealed that she had personally briefed the president on the case.

'Important News Conference'

Powell is friendly with Ellis, the campaign attorney, according to two officials with knowledge of the inner workings of the Trump campaign. But precisely how Powell came to be a leading face of Trump's election challenges, and onstage last week at the RNC news conference, remains a mystery even to some who have long been deeply involved in the campaign, they said.

Powell, according to a third campaign official, simply showed up at headquarters a couple of days after the election.

"She was not involved whatsoever in the conventional campaign legal structure or the RNC legal structure," the official said. "She was totally on the outside. She had not been involved whatsoever."

Powell, the official said, began pressing the campaign to focus suspicion on Dominion Voting Systems. She told Trump campaign officials that the Dominion strategy was ideal because it would draw into question the accuracy of voting in so many states, the official said.

The two other officials said that when Trump's actual lawyers sought evidence from her, she produced none.

Campaign lawyers Justin Clark and Matt Morgan told others they should not present the Dominion theory because there was no evidence for it, the two officials said. The campaign official who was surprised by her sudden involvement said she did not seem interested in having the evidence.

"What you saw with Sidney Powell and Rudy, it wasn't shoot first and ask questions later. It was shoot first and don't ask questions at all," that official said.

Some RNC and campaign lawyers decided to avoid all meetings where Powell was present, this person said. The night before the Nov. 19 news conference, Ellis, Giuliani, Powell — and Flynn — were all together, the official said.

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Early the next morning, Trump tweeted a promo: “Important News Conference today by lawyers on a very clear and viable path to victory. Pieces are very nicely falling into place. RNC at 12 p.m.”



Powell participates in a news conference with President Trump's personal lawyer Rudolph W. Giuliani at the Republican National Committee headquarters in Washington on Nov. 19. (Jonathan Ernst/Reuters)

Spencer S. Hsu contributed to this report.

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Aaron Davis is an investigative reporter who has covered local, state and federal government, as well as the aviation industry and law enforcement. Davis shared in winning the Pulitzer Prize for Investigative Reporting in 2018. [Follow](#)



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Viewing Options



zaffy54 2 weeks ago (Edited)

Sounds like dementia, mental instability, or a brain tumor to me. A complete change of personality and morals. It's amazing that Trump continues to be associated to people who are "on the edge." Although, I suppose, it's easier to form a cult with people like this.

Like 2 Link Report

morals. It's amazing that Trump continues to be associated to people who are "on the edge." Although, I suppose, it's easier to form a cult with people like this.

Like  2 Link  Report 



Amphib Sailor 3 weeks ago

As Pink Floyd put it, "Paranoia will destroy ya."

Like  2 Link  Report 



AliBubba 3 weeks ago

Guano loco.

Like  1 Link  Report 



Oxenstirna 3 weeks ago

Most people think of her as a walking disinformation disaster. Sad too. She used to be a good lawyer. Then she did not just walk, but she ran off the cliff.

Like  2 Link  Report 



Vox Anima 3 weeks ago

Has Powell been screened for onset dementia or paranoid personality disorder with delusions?



If not, perhaps she should be. She is so far down the rabbit hole even the Mad Hatter is concerned.

Like  4 Link  Report 



PopcxqueenfromVA 4 weeks ago




And this is also a cautionary tale; the worst of the worst of humanity tends to flock together and toxically and co-dependently enable the other's worst behaviors and impulses.

Like  4 Link  Report 



BruceMcD 4 weeks ago

But then throw one another under any ol' bus when the time is right.

Like  3 Link  Report 



PopcxqueenfromVA 4 weeks ago

Exhibit 24



Defending the Republic

Legal Defense Fund for the American Republic

Menu



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DEFENDING THE REPUBLIC!



Defending the Republic is the Legal Defense Fund for the American Republic ("LDFFtar") and was established to defend the Republic and to protect the integrity of elections in the United States.

MISSION

MISSION

To protect and defend the lawful votes of American citizens, ensure election integrity, educate the world on what it means to be a constitutional Republic, and pursue legal action to preserve the vision of our Founders and to maintain this great Republic.

DONATE BELOW

Please contribute to the Legal Defense Fund to Defend the Republic below, your donation will support our mission and the welfare of the American Republic.



Overview

Attorney Sidney Powell needs your immediate support to halt the certification of ballots in Georgia, Michigan, Nevada, Pennsylvania, and Wisconsin.

Over \$500,000 must be raised in the next twenty-four hours for these suits to be filed. Millions more will need to be raised to ensure victory.

In Bush v. Gore the Supreme Court recognized that once vested in the people, the right to vote is fundamental, and one source of its fundamental nature lies in the equal weight of each vote.

In Bush v. Gore the Supreme Court recognized that once vested in the people, the right to vote is fundamental, and one source of its fundamental nature lies in the equal weight of each vote.

This fundamental right to equal weight was not defended or actualized in this election. There is evidence of ballots being discarded, hundreds of thousands of ballots appearing out of thin air, ballot harvesting, and a lower standard of verification for some mail-in ballots. This is voter fraud and has infringed upon Americans' sacred right to vote and for their votes to carry equal weight.

The case will seek to block the certification of the election results so that justice can be done. We need to stop the steal in its tracks.

The future of our Republic is at stake. The left, the media, and a complicit Republican Establishment are attempting to steal this election through a staggering voter fraud operation. The time to fight is now!

"A Republic...if you can keep it."

Benjamin Franklin



CONTACT FORM:

Name

First

Last

Email

Name

First

Last

Email**Phone number****Comment or Message****Submit**

To contact Sidney Powell directly, please visit her website:

<https://www.sidneypowell.com>

Thank you for Defending the Republic and supporting the Legal Defense Fund for the American Republic ("LDFFTAR").



Exhibit 25

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File:

20201229 The Rush Limbaugh Show.mp4

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1 (ADVERTISEMENT.)

2 ANNOUNCER: The Rush Limbaugh Show starts
3 now on Talk Radio 680 WCBM.

4 SPEAKER: He's worked as a Fortune 500
5 Technology Executive, and was CEO of the first
6 Internet radio network. He's a digital political
7 strategist, helping the right side use new
8 technology more effectively. He's a public
9 speaker. Sitting for Rush Limbaugh today, ladies
10 and gentlemen, please welcome Todd Herman.

11 TODD HERMAN: What an honor it is to fill
12 in for Rush Limbaugh as he enjoys his traditional
13 Christmas break through New Year's.

14 800-282-2882, if you want to join us on the
15 program on today, the day the Lord is made and the
16 time in which God has asked us -- well, what creed
17 he will live -- he didn't ask us -- and such
18 responsibilities we have.

19 We live in an era of big lies, big COVID
20 lies. We live in an era of big government lies.
21 I don't think anyone knows that better than the
22 author of Licensed to Lie, exposing corruption in
23 the Department of Justice, Sidney Powell.

24 And you know Sidney, obviously, because of
25 her heroic defense of General Flynn, and now an

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1 attempt to -- I -- get the evidence seen, let's
2 say it that way -- to look into what I feel, what
3 I see, as -- as massive vote fraud in this
4 election. Sidney Powell joins us on the Rush
5 Limbaugh Program.

6 Sidney, welcome to the show. It's Todd
7 Herman filling in.

8 SIDNEY POWELL: Oh, thank you so much,
9 Todd. I really appreciate being on.

10 TODD HERMAN: Well, you know, Sidney, I've
11 asked my audience to submit questions for you, and
12 I am amazed at the range of those, and -- and the
13 tone; and I want to get to that.

14 I want to just speak as -- just -- just a
15 dude, just a guy who wants my daughter to grow up
16 in a country of laws. God bless you for what you
17 did for us by way of General Flynn.

18 And I wanted to ask you just a quick
19 question about that, as -- as you fought so hard
20 for him. How quickly and what -- what told you
21 that -- that this was a case you wanted to take,
22 and how -- did you know immediately that they had
23 lied to get to Flynn, or to try to flame -- frame
24 him; what -- what caused you to get into that?

25 SIDNEY POWELL: Yes, I did know

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1 immediately, because I saw how they worked and
2 that's what caused me to write Licensed to Lie,
3 exposing corruption in the Department of Justice,
4 that I published in 2014.

5 So as soon as General Flynn was targeted,
6 it was obvious to me that he was targeted, because
7 of the timing of it and the fact that it made no
8 sense whatsoever.

9 He is former director of the defense
10 intelligence agency for President Obama, he knew
11 darn well that they have tape recordings of all
12 the conversations, and they intercept all
13 conversations with foreign officials, and he told
14 them that.

15 And he -- he knew it and he told McCabe he
16 knew it, and the agents knew he knew it. There
17 was absolutely no reason for him to misstate
18 anything, and there was no reason for them to go
19 interview him.

20 Any notion that General Michael Flynn was,
21 quote, an agent of Russia, would be laughable were
22 it not the source and -- and contrived lie that it
23 was, it -- to have a pretext to investigate him.
24 It was absolutely one of the grossest abuses of
25 power I have ever seen this country engage in.

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1 TODD HERMAN: Sidney, I have seen so much
2 over the past four years that is really -- it's
3 changed things that I believe and -- and just
4 irreparably so. I've talked to people abused by
5 Department of Justice in their businesses, and I
6 watched the lies around Russia, et cetera.

7 So I would have been having a different
8 conversation with you, let's say three years ago,
9 than I'm prepared to have now about vote fraud,
10 because I saw the fraud coming. I saw the set up.

11 So I want to get to this new report you
12 have and -- and have you explain in like an
13 elevator pitch what's in that report.

14 And then I want to get to some of these
15 questions want to ask you that range from: Hey,
16 really is there any chance to will you be Trump's
17 AG?

18 So what's in the new report, Sidney Powell?

19 SIDNEY POWELL: The new report has a
20 truckload of evidence of foreign interference in
21 the election in it. That's what people want to
22 seem to deny, even though the FBI and the -- the
23 counterintelligence -- or whatever it's called
24 that's part of Homeland Security -- that looks at
25 foreign interference in elections; you know, the

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1 same guy that said there was no problem here,
2 actually issued an advisory and alert back on
3 October 30th and updated on November 3rd,
4 documenting foreign interference in the election.

5 So for them to deny that now is absolutely
6 absurd. Plus we have an affidavit from an expert
7 cyber warfare person who even shows the diagram of
8 all the attacks coming in, and we know that the
9 VPNs of virtual protocol -- something or other --
10 for computers -- I'm not a computer geek, as you
11 can probably tell.

12 Anyway, they -- the Dominion people left
13 those open the night of the election and
14 unencrypted, so anybody could get in.

15 We know that the packets of information
16 went to Serbia and Liechtenstein, and Spain and
17 Venezuela, and Hunan, China and Hong Kong. I
18 mean, there was traffic all over into our election
19 system that is supposed to be self-contained, not
20 accessible by the Internet at all.

21 We have witnesses who document that it was
22 connected to the Internet. We have a study out of
23 one of the -- the voting systems that we were
24 finally allowed access to in Michigan. They know
25 it was connected to the Internet. They erased

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1 their -- all their -- their audit files and their
2 adjudication files where they dumped over 68
3 percent of the ballots into a -- a bin that they
4 call adjudication. That would have been thousands
5 and thousands of ballots. And then an individual
6 with no scrutiny whatsoever decides what to do
7 with those.

8 And, obviously, they were trained to either
9 flip them for Biden, trash them for Trump, move
10 them to a third-party candidate, and then do
11 something else with them. It was a very elaborate
12 and well-organized plan. And --

13 TODD HERMAN: And --

14 SIDNEY POWELL: -- we're documenting that
15 in lawsuits that we filed and -- that are now
16 pending before the Supreme Court regarding the
17 states of Arizona, Georgia, Michigan and
18 Wisconsin.

19 TODD HERMAN: Sidney Powell is with us.
20 And Sidney, I was drawn into believing the
21 election was stolen when I saw some analysis by
22 Patrick Byrne, who's a gentleman who was the
23 founder of Overstock.com, and a -- and a great,
24 great math mind and -- and computer mind.

25 A friend of mine named Justin Heart who is

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1 an independent data analyst, and not at all a
2 grenade thrower. Very settled, scientific mind,
3 who simply looked at the data and said: I am
4 seeing structured data and raw data, it shouldn't
5 be here; seeing votes switched from Trump to
6 Biden. So I'm with you on.

7 And here's -- here's, I think, the crux of
8 this question -- or crux of this issue. I
9 think -- I'll bowl down the questions of listeners
10 to this: Has a judge anywhere actually looked at
11 the evidence that you have or have they just read
12 your brief, has any judge in any of these cases,
13 Sidney, said I want to see all the evidence?

14 SIDNEY POWELL: No. No, judge has heard
15 the evidence. No judge has truly even looked at
16 the affidavits that have been attached. They have
17 dismissed the cases out of hand on issues like
18 standing or the extension doctrine -- actually
19 this ridiculous litany of excuses to reject our
20 cases in particular, because we represent electors
21 who have standing under the constitution in all of
22 these states.

23 So for them to dismiss our cases on any
24 basis is absolutely ridiculous. We have just an
25 extraordinary volume of evidence that you wouldn't

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1 even put in the complaint stage of a normal case.
2 But knowing the scrutiny this was going to
3 receive, we've documented it extremely well, as
4 best as could be possibly done in the length of
5 time allowed under the whole election set up.

6 I mean, this was a masterful, Machiavellian
7 scheme, by all the people that pulled it off. And
8 they -- COVID was the cover for the fake ballots.
9 There are hundreds of thousands of fake ballots
10 that were generated and they --

11 TODD HERMAN: Let's talk about that.

12 SIDNEY POWELL: -- to the system --

13 TODD HERMAN: Let -- let me talk about
14 that --

15 SIDNEY POWELL: Yeah, we're getting even
16 more evidence on that every day.

17 TODD HERMAN: Okay. That's -- that's new
18 information to me, and I want to hear about the
19 fake ballots.

20 I've heard witnesses say I've seen ballots
21 come in that were on different paper, they were
22 all for Biden. It looked like it was the same
23 markings on each ballot. It took looked like it
24 was -- you know, copied forms. It didn't look
25 like natural ballots.

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1 So do you have these ballots? Could you
2 take these ballots or copies of these ballots,
3 hand them to a judge and say, look, all of these
4 are the same, Your Honor; this is a copy machine.
5 Do you have that?

6 SIDNEY POWELL: I -- I know somebody who
7 has some of those, we are in the process of
8 getting them. And there should be a lot more of
9 them out there, if we can get access to the actual
10 ballots from any court; which actually is required
11 by federal law, but nobody is following the law
12 here. It would be much easier to prove it.

13 But, yes, they were bins and bins and bins
14 of fake ballots that were shipped across the
15 country the night -- and, you know, the night of
16 the election, in the middle of the night, and
17 others that were shipped previously to be in place
18 in different cities, mainly the most corrupt ones
19 of -- that are democrat strongholds that stopped
20 counting votes the night of the election, until
21 they could get the new ballots they needed to
22 backfill into the system to try to create the
23 votes that would make Biden appear to win.

24 TODD HERMAN: So as you listen to Sidney
25 Powell, I want to remind you of something, Sidney

1 defended Michael Flynn. General Flynn.

2 And the government withheld ballot -- or
3 not ballots -- but withheld evidence, exculpatory
4 evidence, evidence that showed that the first
5 investigators who talked to Flynn went back to
6 DOJ/FBI and said, hey, this guy is good, there's
7 -- I don't see any -- I don't see any intent to
8 deceive.

9 And Sidney Powell had to spend her time and
10 her money and her efforts to force the release of
11 that, and it took forever.

12 Sidney, could you hold with us through the
13 break, and when we come back -- is that okay, if
14 you hold for a couple of minutes --

15 SIDNEY POWELL: Yeah.

16 TODD HERMAN: -- and come back and talk
17 some more with us? I want you --

18 SIDNEY POWELL: Yes, I can do that.

19 TODD HERMAN: -- to think about this; when
20 we come back, I want you to imagine a circumstance
21 where you find yourself in an elevator with five
22 members of the Supreme Court, and you have a
23 90-second opportunity to make your elevator pitch
24 to say: Miss -- you know, Madam and -- and -- and
25 Mr. Justice, I hope to interest you in actually

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1 seeing my evidence.

2 So when we come back with Sidney Powell,
3 Sidney, I want you to undertake a 90-second --
4 just tell us how this election was stolen, and the
5 proof you would offer Supreme Court justices as
6 you're stuck in an elevator with them.

7 Sidney Powell joins us on the Rush Limbaugh
8 Program. It's Todd Herman filling in on the EIB
9 network.

10 (Advertisement.)

11 TODD HERMAN: This is Todd Herman filling
12 in for Rush Limbaugh on the EIB network. Sidney
13 Powell is with us, has been involved in over 500
14 federal appellate cases, is an attorney that you
15 recognize for having defended and finally gotten
16 justice for Michael Flynn, joins us on Rush's
17 show.

18 Sidney, before the break I asked you to
19 just imagine the circumstance that you find
20 yourself in an elevator with five supreme court
21 justices, and it's a long elevator ride and you've
22 got 90 seconds; and so Mr. and Madam Justice --
23 and I don't know the -- the specific honorific,
24 you have 90 seconds to convince them to actually,
25 Sidney, look at your evidence, 90 seconds with the

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1 justices; how does Sidney Powell proceed?

2 SIDNEY POWELL: Well, the very night of the
3 election many people saw something they have never
4 seen before in the history of our elections. They
5 saw votes being changed on the screen in front of
6 them, going from President Trump to Mr. Biden.

7 On top of that, the morning after the
8 election -- well, even that night, the voting
9 stopped. They stopped counting in multiple
10 districts at the same time, before the vote got to
11 270 electors for President Trump.

12 That's never happened before. The only
13 time votes have ever stopped being counted in this
14 country on election night was when the Broward
15 County problem developed over the hanging chads in
16 one county in Florida.

17 So for five states to stop counting on
18 election night is absolutely unprecedented. And
19 they did it because the vote count for the
20 Electoral College was about to hit and go over 270
21 for President Trump, because of the massive
22 outpouring of votes for him that night.

23 By the next morning multiple mathematicians
24 had contacted me and told me they knew the
25 algorithm that had been run to change the votes.

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1 It was that obvious to people with mathematical
2 expertise. It is a mathematical impossibility for
3 hundreds of thousands of votes to have shown up in
4 the middle of the night for President Biden alone
5 -- I mean, for Vice President Biden alone, and to
6 have been injected into the system the way that
7 they were.

8 We have eyewitness testimony of countless
9 people who saw votes coming in unsecured
10 containers and improper means, and looking
11 different the night of the election. These people
12 have come forward at great personal risk to
13 themselves and their families to provide thousands
14 of affidavits of voting abnormalities and -- and
15 actual crimes that they witnessed happen on
16 election night.

17 The very fact that the other side is
18 working so hard to hide all this, federal law
19 requires transparency in our electoral process and
20 our elections. There's a federal statute that
21 requires all the documents pertaining to elections
22 to be maintained for 22 months following an
23 election for the very reason that it has to be
24 completely auditable.

25 A federal judge in October in Atlanta found

1 all kinds of problems with the Dominion system
2 that it -- that Georgia bought and crammed down
3 for everybody across the state to use. That's
4 where the most problems have been is in Georgia.
5 Witnesses have come forward. There was supposedly
6 a water leak they shut down voting for; that was
7 an abject lie.

8 We have video of witnesses pulling suspect
9 ballots out from under a table after they ran off
10 all of observers. Somebody told me that one of
11 the people that did that has told government
12 officials how it happened and -- and what
13 happened; but has that information been provided
14 to the public? No.

15 There is rampant voter fraud of all kinds,
16 federal violations of five years and more across
17 the country but virtue of all the misconduct on
18 election night. The flipping of votes by Dominion
19 is even advised, and their ability to do that to
20 run a fraction to make a Biden vote count 1.26
21 percent, and a Trump vote to only count .74.
22 They've done it before. They've done it in
23 Venezuela. They've done it in other foreign
24 countries. They've done it in this country.

25 We have evidence even that it was done in

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1 2016 in California to benefit Hilary over Bernie,
2 and it's -- it's been done in other local
3 elections and smaller elections, different places.
4 This is the only time it's been this widespread.

5 And the reason it didn't work this time,
6 they've been able to shave these votes for a long
7 time, but the reason it didn't work completely
8 this time, and they had to shutdown in so many
9 places, was because so many Trump supporters
10 poured out on the day of the election to vote for
11 President Trump and they -- what was a landslide
12 victory, a historic victory, is because it broke
13 the algorithm.

14 That's why they had to stop counting that
15 night. That's why they had to bring in ballots
16 and try to backfill. And it still doesn't work,
17 because there's still hundreds of thousands more
18 votes than there were actual voters to vote them.
19 The math simply doesn't add up. And if they had
20 nothing to hide, why aren't they providing
21 transparency into the voting system of the United
22 States of America, the country that is founded on
23 the rule of law, and is supposed to be above all
24 of this. It's absolutely the most appalling
25 criminal operation in the history of our country.

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1 TODD HERMAN: Well, I think we just learned
2 why Sidney Powell is such a successful attorney.
3 I think that's a very compelling elevator speech.

4 And I've got a tough question for you,
5 Sidney. I've asked my audience on Twitter a lot
6 of questions for you, one of them is -- is this:
7 Yes or no, Sidney; do you want people to vote
8 republican in the Georgia race?

9 SIDNEY POWELL: I want Georgia -- well, my
10 concern is it's not going to matter how the people
11 vote in the Georgia race. It obviously didn't
12 matter how they voted nationwide, did it? A
13 thousand --

14 TODD HERMAN: It didn't, but I want people
15 to vote in the Georgia race.

16 SIDNEY POWELL: -- (inaudible) were
17 disenfranchised.

18 TODD HERMAN: Yeah. I -- I -- and I want
19 people to vote in the Georgia race in incredible
20 numbers, and I want all eyes on this, because we
21 cannot hand the senate to these people, Sidney.
22 We cannot do that.

23 And I understand -- the case you just made
24 is very compelling to me. I'm just hoping that we
25 get people to rush in, all eyes on this, because

1 all eyes will be on Georgia, and -- and get that
2 turnout. You don't join me in that?

3 SIDNEY POWELL: Well, yes. I mean, in the
4 situation we're in now --

5 TODD HERMAN: Yeah.

6 SIDNEY POWELL: -- I would suggest that
7 everybody in Georgia turn out on election day
8 and -- and do it again. Vote for --

9 TODD HERMAN: Yeah.

10 SIDNEY POWELL: -- the republican candidates
11 in mass numbers, and -- and see what happens. And
12 it might be that if they even rigged the system so
13 that the two republicans win so they can say, oh,
14 see, there's no problem here.

15 TODD HERMAN: All right. That's -- see, I
16 -- I'm firmly in agreement with you.

17 I started by thanking you for standing up
18 for General Flynn. I want to wrap up, because
19 we -- we -- the clock is (inaudible) the bottom of
20 the hour, and thank you again for that.

21 Real quickly: How can people help you
22 or -- or -- or get in touch with you?

23 SIDNEY POWELL: They can go to
24 Defendingtherepublic.org to make contributions to
25 the -- our nonprofit that is working to help

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1 defend all these cases; and to defend me now, that
2 I'm under a massive attack --

3 TODD HERMAN: Yeah.

4 SIDNEY POWELL: -- from the Attorney General
5 of Michigan and --

6 TODD HERMAN: Right.

7 SIDNEY POWELL: -- and the City of Detroit,
8 and everything else. Follow me on Twitter
9 @SidneyPowell, the number one. Twitter is
10 suppressing the heck out of me and go --

11 TODD HERMAN: All right.

12 SIDNEY POWELL: -- like kracken-wood.com,
13 where we're aggregating the news that's important
14 for people to see on these issues.

15 TODD HERMAN: There it is, Sidney Powell
16 joins on us on the Rush Limbaugh Program.

17 A real pleasure, Sidney. Go with God's
18 good grace and protection.

19 Coming up, Louie Gohmert. Just around the
20 corner, more discussion of election fraud with
21 Representative Louie Gohmert. It's Todd Herman in
22 for Rush Limbaugh on the EIB network.

23 (Advisement.)

24 (End of the recording.)

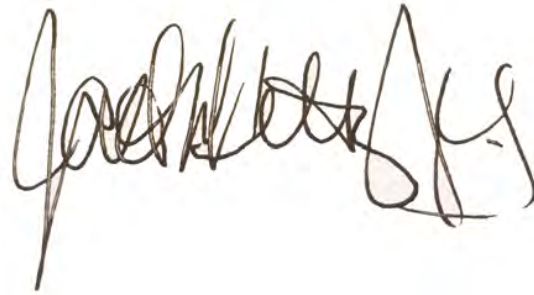
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C E R T I F I C A T E

I, JACKIE MENTECKY, do hereby certify that
I was authorized to transcribe the foregoing recorded
proceeding, and that the transcript is a true and
accurate transcription of my shorthand notes to the best
of my ability taken while listening to the provided
recording.

Dated this 29th day of December, 2020.

A handwritten signature in dark ink, appearing to read "Jackie Mentecky", written over a horizontal line.

JACKIE MENTECKY

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Exhibit 26

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FILE NAME:

Sidney Powell to Newsmax TV - Our Case Was Pre-Judged
(7:36 min)

TRANSCRIPT OF VIDEO-RECORDED INTERVIEW

SIDNEY POWELL

GREG KELLY

Transcribed By:
TERRI NESTORE
CSR No. 5614, RPR, CRR

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1 SIDNEY POWELL: We will not allow ourselves to
2 continue to be influenced by flat-out communism,
3 socialism, any of the dark forces that have come to impose
4 their will on so many of us. Now is the time for every
5 patriot in this country to stand up, make their voices
6 heard, and be counted.

7 GREG KELLY: Sidney Powell certainly stood up,
8 and she counts in a big way. Sidney Powell, former
9 federal prosecutor, counsel for General Flynn.

10 She's been working on behalf of the president but
11 not directly with the president's team legally.

12 Sidney, welcome back to Newsmax. Gosh, we're
13 pulling for you. As you know, this is an opinion show and
14 we're on your side. How you holding up, first of all?

15 SIDNEY POWELL: Oh, we're doing fine, thank you,
16 Greg. The pace is a bit much at times but we just plow on
17 through it, and we're determined to win because the
18 American people have been defrauded from their lawful
19 votes in this election and that cannot stand.

20 GREG KELLY: So, totally agree.

21 Let's talk about what happened today in that
22 Georgia courtroom. A defeat -- not the first one.

23 This happens in the process, but you got shut
24 down today, at least in federal court.

25 Can you tell us about what happened?

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1 SIDNEY POWELL: Yes. We were there for a hearing
2 on motions to dismiss filed by every organization that you
3 can imagine, even as intervenors, where they had no place
4 to be in our case, but the DNC and Perkins Coie law firm
5 and everyone aligned on the left decided to file briefs in
6 our case, and the court let them do that.

7 And they argued against our complaint that
8 alleges all the election fraud and multiple federal
9 constitutional claims that arise from that that
10 invalidated the votes of hundreds of thousands of
11 Georgians who voted for President Trump. Some didn't have
12 their votes counted, some had their votes eradicated,
13 effectively, by fraudulent ballots. The court wouldn't
14 pay any attention to any of it. It was obvious the judge
15 had made up his mind before he hit the bench, and he read
16 from prepared notes when he granted the motion to dismiss.

17 So we had oral argument but I would say it was
18 essentially meaningless, except to the extent the public
19 got to hear another federal judicial proceeding that
20 didn't turn out the way it should have.

21 GREG KELLY: So Sidney, can you give us a little
22 bit of a path forward. What happens next? We have had
23 some difficulties in court, as you know.

24 You still have the fire, a lot of folks have
25 faith but the Electoral College is meeting next week, so

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1 how is this going to play out?

2 SIDNEY POWELL: Well, we're going to proceed
3 immediately with an emergency appeal and we expect to get
4 relief in the Supreme Court.

5 GREG KELLY: And all right, so let's go -- and by
6 the way, there are lots of different tracks going on here.

7 You're still focused primarily on the Dominion
8 voting machines and the issues on a technical basis,
9 correct?

10 SIDNEY POWELL: The multiple means of fraud that
11 resulted in the supposed win for Biden, when it was
12 actually a landslide for Trump, but yes, we focus also on
13 the systemic problem with the Dominion machines.

14 We have an expert who's identified that the vote
15 for Biden was five percent overall greater wherever there
16 were Dominion machines than any of the other votes. That
17 is essentially the amount of votes that can flip and brag
18 about being able to flip.

19 We know from one of our witnesses that these
20 machines were created in Venezuela and the entire process
21 was started there to make sure Mr. Chavez won every
22 election, and then of course the Wall Street Journal I
23 think today featured Venezuela's rigged election for
24 Maduro. This is the same technology, the same equipment.

25 It came out of Venezuela to be used here.

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1 I would imagine our three letter agencies have a
2 role in it. We're essentially fighting the entire
3 globalist elite power structure that wants to control the
4 world for their own financial benefit and frankly, that
5 includes a lot of American corporations that have
6 international interests and want to do business with
7 China, have made back deals with the Chinese, and untold
8 numbers of politicians who have done the same thing.

9 GREG KELLY: You know, two years ago, I would
10 have said that sounds crazy, but after all that's
11 happened, I think you're absolutely right.

12 I think this is the way the world works.

13 By the way, I do want to ask you about the
14 servers overseas. Dominion reportedly has all kinds of
15 internet connections and for whatever reason, they were
16 counting the votes in places like Spain and Germany.

17 You've seen the reports, maybe you know firsthand
18 that, you know, some of these servers may or may not have
19 been seized, overseas equipment of Dominion taken
20 possession of by forces friendly to the United States.

21 Do you know anything about that?

22 SIDNEY POWELL: I am hoping it's the Department
23 of Defense that has them. That is certainly who should
24 have them because it's a national security risk.

25 The Dominion Systems should never have been

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1 allowed in this country. They are internationally owned.

2 Our votes were counted in Frankfurt, Germany, and
3 altered in Barcelona, Spain, and other places.

4 We simply cannot allow that, as the United States
5 of America. We must maintain sovereignty over all our
6 crucial systems, and the voting system is one of them.

7 The fact that CFIUS, the organization of heads of
8 various agencies ever approved this a number of years ago,
9 I find absolutely appalling.

10 GREG KELLY: Supreme Court tomorrow for you?

11 SIDNEY POWELL: I'm sorry, I missed that.

12 GREG KELLY: Will you be in the Supreme Court
13 tomorrow? You said emergency relief. Does that entail
14 you going there? How is that going to actually work?

15 SIDNEY POWELL: That's going to work as fast as
16 we can humanly make it work. It may not be tomorrow.

17 But we also have a case out of Michigan that
18 needs to go, a case out of Arizona that may very well wind
19 up there. There should be at least three states before
20 the Supreme Court with enough electoral votes to change
21 the outcome before the end of the week.

22 GREG KELLY: Sidney Powell, I wish I was an
23 attorney and I could help out, or I knew something about
24 computers, but I don't. So the good thing is I know
25 you're not on your own. I know you have a lot of

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1 attorneys and good people working with you.

2 SIDNEY POWELL: We have an amazing team of great
3 patriots.

4 GREG KELLY: Great patriots. Well, let us know
5 if you need anything, all right?

6 SIDNEY POWELL: Thank you very much.

7 People can donate at defendingtherepublic.org.

8 GREG KELLY: One more time on that website,
9 please.

10 SIDNEY POWELL: Defendingtherepublic.org.

11 And there's another great website where we're
12 uploading documents, kraken, K-R-A-K-E-N, hyphen wood,
13 W-O-O-D, dotcom. Twitter keeps trying to take that down,
14 and they've taken down our Twitter handle on that but it's
15 a project Lin Wood and I started to get the word out about
16 all these issues.

17 GREG KELLY: The kraken, I've been hearing a lot
18 about that stuff. Good stuff. Thank you very much.

19 To be continued.

20 Sidney Powell, good luck and we'll see you soon.

21 SIDNEY POWELL: Thank you, Greg.

22 GREG KELLY: You bet. Merry Christmas too.

23 Beautiful tree back there.

24 (End of recording.)

25

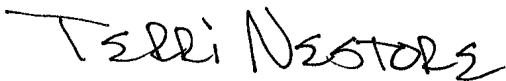
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C E R T I F I C A T E

I, TERRI NESTORE, Certified Shorthand Reporter/
Transcriptionist, do hereby certify that I was authorized
to transcribe the foregoing recorded proceeding, and that
the transcript is a true and accurate transcription of my
shorthand notes, to the best of my ability, taken while
listening to the provided recording.

I further certify that I am not of counsel or
attorney for either or any of the parties to said
proceedings, nor in any way interested in the events of
this cause, and that I am not related to any of the
parties thereto.

Dated this 18th day of December, 2020.



TERRI NESTORE, CSR 5614, RPR, CRR

Exhibit 27

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FILE NAME:

Evidence of Fraud:

Sidney Powell and Lou Dobbs discuss

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1 LOU DOBBS: Good evening, everybody. We
2 have a blockbuster of a story and a show for you
3 tonight.

4 We will be joined in just a few moments by
5 attorney Sidney Powell, who this evening appears
6 to have delivered on her promise kracken
7 thunderbolt that she promised America two weeks
8 ago.

9 She calls what happened on November 3rd now
10 a 2020 Cyber Pearl Harbor. Sidney Powell joins us
11 in just moments.

12 But first we want to touch on a number of
13 new developments today. The federal investigation
14 of Joe Biden's son Hunter Biden, new information.
15 The U.S. Attorney's Office in Delaware is looking
16 into Biden's foreign business dealings, especially
17 with China.

18 That investigation has been ongoing, we
19 have learned, since 2018. Joe Biden's campaign
20 says in a statement that Biden is, quote, deeply
21 proud of his son who has fought through difficult
22 challenges, including the vicious personal attacks
23 of recent months, only to emerge stronger.

24 The U.S. Attorney in Delaware is
25 Trump-appointed David Weiss. He has refused to

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1 comment on what is, obviously, an ongoing
2 investigation. But sources tell Fox News that
3 that investigation was predicated in part by
4 transactions in China, and other foreign nations.

5 The investigation is also examining a trove
6 of messages and documents found on Hunter Biden's
7 laptop that he left at that famous computer repair
8 shop.

9 That story first reported in a bombshell
10 New York Post expose was censored, buried by big
11 tech and social media. Facebook and Twitter both
12 remain silent today about why they censored that
13 report before the presidential election.

14 50 former members of the Deep State
15 intelligence community even wrote a letter calling
16 the Hunter Biden's story, quote, Russian
17 disinformation, end quote.

18 That message then dutifully echoed by the
19 corporate left-wing national media.

20 SPEAKER: We know that this whole smear on
21 Joe Biden comes from the Kremlin.

22 SPEAKER: Russian disinformation or foreign
23 disinformation or -- or even this -- you know,
24 campaign disinformation period --

25 SPEAKER: This is most likely Russian

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1 propaganda.

2 SPEAKER: Charges so heinous I'm not even
3 going to say them.

4 SPEAKER: Peddling baseless conspiracy
5 theories about Joe Biden and his son.

6 SPEAKER: Prosecutors do not open
7 investigations based on disinformation provided by
8 Russian intelligence.

9 LOU DOBBS: Russian intelligence. Well,
10 anyone in the media who dared question Hunter
11 Biden's business dealings or how much Joe Biden
12 knew about those dealings, was deemed a conspiracy
13 theorist.

14 Senators Chuck Grassley and Ron Johnson
15 spent more than a year investigating the Biden
16 family corruption.

17 On the Senate floor today, Chuck Grassley
18 blasted the buoyant cover-up of their work.

19 CHUCK GRASSLEY: Those same liberal outlets
20 that disparaged our investigation now report that
21 Hunter Biden's financial deals in China raise
22 counterintelligence concerns.

23 So you can understand why I think it's very
24 outrageous that the Fourth Estate would choose to
25 ignore facts when they are uncovered by

1 Republicans.

2 LOU DOBBS: The senate has produced a
3 report covering many of Hunter Biden's past
4 business dealings with China, including some that
5 are flagged for, quote, potential financial
6 criminal activity.

7 For more on that, we turn to Hilary Vaughn
8 in Wilmington, Delaware. Hilary?

9 HILARY VAUGHN: Hi, Lou. We went digging
10 around for what Hunter Biden was up to, who he was
11 doing business with, in the days, months and years
12 leading up to the grand jury investigation that we
13 now know kicked off in 2018.

14 Fox News is now learning that that grand
15 jury investigation is not just digging into Hunter
16 Biden's taxes, but also covers money laundering
17 and also suspicious foreign transactions from
18 China.

19 So a Senate report looked into Hunter
20 Biden's overseas business deals, and they were
21 lead to two conclusions: Hunter Biden had
22 business relationships with Chinese nationals
23 linked to the communist government, and those
24 connections turned up millions of dollars in cash
25 flow that Hunter Biden benefitted from.

1 The Senate report also says that financial
2 records that they obtained tied to Hunter Biden
3 showed, quote, consistent, significant and
4 extensive financial connections between Hunter
5 Biden and Chinese nationals connected to the
6 communist regime, and say that these raise
7 criminal financial concerns.

8 So we looked at the money trail and we saw
9 detailed in the report Hunter Biden's business
10 relationship with two Chinese businessmen, Ye
11 Jianming and Gongwen Dong, whose connections to
12 the Chinese communist government were extensive.

13 In September 2017, Hunter Biden opened a
14 line of credit with Ye's right-hand man Gongwen
15 Dong under the business name Hudson West III.
16 That same account has credit cards given to Hunter
17 Biden, Joe Biden's brother James, and his wife
18 Sarah. And the three of them use those credit
19 cards to go on \$100,000 spending spree on hotels,
20 restaurants and Apple products.

21 Between August 2017 and September 2018,
22 that same business Hudson West III, sent frequent
23 payments to Hunter Biden's law firm, totalling
24 \$4.7 million, just over that year; and also during
25 that same time frame, Hunter Biden's law firm sent

1 20 wire transfers, totalling \$1.3 million to Joe
2 Biden's brother James' consulting firm. Several
3 of these transactions tied to Hudson West III and
4 Hunter Biden were flagged in this report as
5 suspicious and possible financial criminal
6 activity.

7 And that was noted in this report, Lou,
8 that came out well before we just found out this
9 grand jury investigation went public two days ago.
10 Lou.

11 LOU DOBBS: Hilary Vaughn reporting. It is
12 a blockbuster day of developments.

13 Now, let's turn to the battle for the White
14 House.

15 President Trump has personally filed with
16 the Supreme Court to join the Texas lawsuit to
17 throw out the election results in the states of
18 Pennsylvania, Georgia, Michigan, and Wisconsin,
19 claiming they are unconstitutional.

20 Texas and the President also winning strong
21 support today from seven other states. Attorney
22 Generals of Missouri, Arkansas, Louisiana,
23 Mississippi, South Carolina, and Utah, all filing
24 a motion to join the Texas Supreme Court lawsuit.

25 Another 11 states have filed briefs in

1 support of Texas, and the lawsuit.

2 Our first guest tonight has new information
3 regarding electoral fraud in the radical left's
4 efforts steal an election; and she charges four
5 individuals as authors of what she calls a Pearl
6 Harbor-style cyber attack on the 2020 presidential
7 election.

8 There are four names that she highlights.
9 They are: Jorge Rodriguez, the communications
10 minister of Venezuela. Khalil Majsub, Jorge
11 Rodriguez's right-hand man. Gustavo Reyes-Zumeta,
12 who designed programs to rig election machines.
13 And Antonio Mugica, the CEO of Smartmatic, an
14 electoral voting corporation.

15 Joining us now is Sidney Powell, a
16 distinguished attorney, former federal prosecutor,
17 best selling author, general Mike Flynn's defense
18 attorney, and as we all know, a great American.

19 Sidney, great to have you with us. You say
20 these four individuals led the effort to rig this
21 election. How did they do it?

22 SIDNEY POWELL: Well, Lou, they designed
23 and developed the Smartmatic and Dominion programs
24 and machines, that include a controller module
25 that allows people to login and manipulate the

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1 vote, even as it's happening.

2 We're finding more and more evidence of
3 this. We now have reams and reams of actual
4 documents from Smartmatic and Dominion, including
5 evidence that they planned and executed all of
6 this.

7 We know that \$400 million of money came
8 into Smartmatic from China, only a few weeks
9 before the election; that there are George Soros
10 connections to the entire endeavor. Lord
11 Malloch-Brown was part of it, along with the other
12 people from Dominion.

13 Eric Kumer, the person who also holds
14 patents on some of the software, and was operating
15 out of the Denver office, I believe. We know that
16 one of Smartmatic people has -- went to Tarrant
17 County, Texas and turned that county blue, after
18 having been an executive with Smartmatic, and all
19 of the sudden this one election Tarrant County is
20 purportedly blue. We have evidence of how they
21 flipped the votes, how it was designed to flip the
22 votes. And that all of it has been happening just
23 as we have been saying it has been.

24 LOU DOBBS: Well, what is the evidence that
25 you have compiled, how have you constructed the

1 architecture of this relationship among these four
2 individuals?

3 SIDNEY POWELL: Well, we are still
4 reviewing the massive amount of documents that we
5 have, but we have communications between them.
6 And all different kinds of messages that indicate
7 their involvement in it. It's a massive amount of
8 additional information to go through, that's only
9 been in our hands a short time. But we will be
10 producing more and more of it; it will be coming
11 out more by the day.

12 And then also the connections --

13 LOU DOBBS: I want to --

14 SIDNEY POWELL: -- of the Chinese and --
15 and other countries that were attacking us in this
16 massive Cyber Pearl Harbor, as we called it.

17 LOU DOBBS: Jorge Rodriguez, I want to go
18 through -- we're going to put up on the screen so
19 people can follow the conversation here, because
20 these are names that most of us are not familiar
21 with.

22 You said that Jorge Rodriguez, the
23 Venezuelan -- former Venezuelan communications
24 minister, is the ringleader, the CEO of the
25 enterprise, as you put it.

1 What is the evidence that this former
2 communication minister could reach into the U.S.
3 electoral system and raise the havoc and commit
4 the fraud that, obviously, we have witnessed in
5 2020?

6 SIDNEY POWELL: Well, we've known from
7 early on in our independent investigation that the
8 entire system was created for the benefit of
9 Venezuela and Hugo Chavez to rig elections to make
10 sure he continued winning. And then it was passed
11 onto Mr. Maduro to do the same. And we know it
12 was exported to other countries by virtue of some
13 of the Dominion executives that proceeded to go
14 about and essentially sell elections to the
15 highest bidder.

16 We know, for example, that Mr. Rodriguez
17 has on been TV incessantly trying to -- and
18 actually mocking the United States. He is one of
19 the highest --

20 LOU DOBBS: Venezuelan television?

21 SIDNEY POWELL: -- people in the -- yes,
22 Venezuelan television. And he's -- he's -- he's
23 been one of the leaders of the whole
24 election-stealing project. But keep in mind,
25 Venezuela has been highly influenced by the

1 Chinese. And we know from filings with the SEC
2 and otherwise, that the Chinese put \$400 million
3 into Dominion only four weeks before the election;
4 and they shared office space with George Soros'
5 companies, as well as the leadership of Lord
6 Malloch-Brown in the -- in the U.K., and Canada.

7 It is a very --

8 LOU DOBBS: Can you --

9 SIDNEY POWELL: -- concerning and troubling
10 and illegal web of conduct that all of which
11 focused on rigging the election in this country.
12 And we're seeing the results in multiple states
13 where we're now identifying specific votes
14 flipped, like in a couple of Georgia counties --
15 in fact, Coffee County, Georgia just yesterday, I
16 believe, refused to certify the results of the
17 election in Coffee County because of the vote
18 disparities and flipping.

19 We're getting more and more evidence out of
20 other counties across the country about the same
21 kind of conduct. We knew from Antrim County, for
22 example, in Michigan that 6,000 votes --

23 LOU DOBBS: Uh-huh.

24 SIDNEY POWELL: -- magically were flipped on
25 election night. I think --

1 LOU DOBBS: Yeah.

2 SIDNEY POWELL: -- the cause of that is
3 going to become more and more apparent as we
4 proceed in the investigation.

5 And, frankly, our national security agency
6 and defense intelligence agency need to be all
7 over this immediately. The evidence is
8 overwhelming --

9 LOU DOBBS: I --

10 SIDNEY POWELL: -- and extremely troubling
11 that this has been going on --

12 LOU DOBBS: We're going to do --

13 SIDNEY POWELL: -- and it didn't just start
14 this year.

15 LOU DOBBS: We're going to be back with
16 Sidney. We're going to take a quick break. We're
17 going to examine in some detail the -- the reasons
18 for what is apparently a broadly coordinated
19 effort to -- to actually bring down this President
20 by ending his second term before it could begin.

21 We'll back with Sidney Powell.

22 Also tonight, postal service subcontractor
23 Jesse Morgan is a whistleblower, one of the most
24 courageous and most important, who stepped
25 forward, he says the FBI, in talking with him, had

1 no interest in his claims of election fraud;
2 instead they harassed his family.

3 We take up the latest in this extraordinary
4 presidential election of 2020. We'll also be
5 talking with Michigan whistleblower Patrick
6 Colbeck. You don't want to miss any of it.

7 And Papa John's founder, John Schnatter,
8 who has been vindicated of claims made against him
9 by Louie Freeh in a weeks-long investigation.

10 The left-wing media has more than ever to
11 account for.

12 We'll be back with Sidney Powell in just a
13 few moments. Stay with us.

14 (Advertisement.)

15 LOU DOBBS: Western District of
16 Pennsylvania are now conducting a criminal
17 investigation of rural hospital company Americore.
18 Investors- -- investigators want to know more
19 about James Biden's role with the company, and
20 whether he used the Biden name to influence
21 decisions.

22 We're back now with attorney Sidney Powell.
23 She was describing a Cyber Pearl Harbor in the
24 2020 the election, focussing on four names.

25 I would also like to put up this element

1 from -- from your investigation, if we could have
2 that full screen up so that we could all go
3 through that with the audience; because it's
4 important as we look at these four names, we're
5 talking about very large -- a very large foreign
6 intrusion and interference in the -- in the
7 election of 2020.

8 Give us -- it's -- it's outrageous that we
9 have an Attorney General, Sidney, who has said
10 that he sees no sign of -- of any significant
11 fraud that would overturn the election. We had a
12 head of the cyber intelligence unit for the
13 Department of Homeland Security who is suing some
14 people, apparently, for saying that his report,
15 basically, was -- it was nonsense when he declared
16 it was the most secure election in the country's
17 history.

18 What are we dealing with here, and how can
19 we get to this, if we have a -- an Attorney
20 General who has apparently lost both his nerve and
21 his commitment to his oath of office, and to the
22 country; we have an FBI director who seems to be
23 as politically corrupt as anyone who preceded him,
24 and a Homeland Security department that doesn't
25 know what the hell it's talking about and is

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1 spending more time playing politics, at least as
2 it applies to Mr. Krebs, than securing the nation.
3 Your thoughts?

4 SIDNEY POWELL: I think it's time for a
5 whole new team across the board, Lou. There's no
6 explanation for the way the FBI has treated
7 witnesses -- I mean, good American citizens who
8 have been brave enough to come forward with direct
9 evidence of things like thousands of ballots --

10 LOU DOBBS: Yeah.

11 SIDNEY POWELL: -- moving from one state to
12 another in the middle of the night to do --

13 LOU DOBBS: I guess --

14 SIDNEY POWELL: -- what is called
15 backfilling into the machines, so that they can
16 perpetrate their fraud, because President Trump
17 won so many votes, he blew up their algorithm.
18 The American people blew up the algorithm they
19 created before the election to shave votes from
20 Biden and give them to Trump. And we're now
21 seeing direct evidence of that happening in -- in
22 multiple counties and multiple states, and we know
23 it happened across the country.

24 You would have to be a damn fool and
25 abjectly stupid not to see what happened here, for

1 anybody who's willing to look at the real
2 evidence. I've uploaded a ton of it on our
3 website --

4 LOU DOBBS: Yeah.

5 SIDNEY POWELL: -- at
6 defendingtherepublic.org, and Twitter is even
7 trying to destroy our new website,
8 kraken-wood.com, where we're also trying to get
9 the word out to the American people on what's been
10 happening here and the truth and upload documents.
11 Twitter took our --

12 LOU DOBBS: Well, let me make this --

13 SIDNEY POWELL: -- account down the first
14 night.

15 LOU DOBBS: Let me -- let me make you an
16 offer, very straightforwardly: We will gladly put
17 forward your evidence that supports your claim
18 that this was a Cyber Pearl Harbor. We have
19 tremendous evidence already but we -- of fraud in
20 this election, but I will be glad to put forward
21 on this broadcast whatever evidence you have, and
22 we'll be glad to do it immediately.

23 SIDNEY POWELL: Awesome.

24 LOU DOBBS: We'll work overnight. We will
25 -- we will take up whatever air we're permitted

1 beyond this broadcast, but we have to get to the
2 bottom of this.

3 And we -- the question now is -- is -- is
4 not about the integrity or the energy of those
5 responsible for securing the national interest for
6 defending this country, it's how in the hell do we
7 defend this country and secure the interest of
8 this company without them? That's really the --
9 the two questions.

10 SIDNEY POWELL: Yes. Well, the American
11 people are going to have to insist on paper
12 ballots with real identification. That's going to
13 be one of the key --

14 LOU DOBBS: Well, that's going to be --

15 SIDNEY POWELL: -- things to stop --

16 LOU DOBBS: -- great for -- I'm -- I'm not
17 even -- Sidney, I've got to tell you, I'm not even
18 going to contemplate the next election. I'm not
19 even contemplating the January 5th election in
20 Georgia. The hell with that.

21 If the people of Georgia are dumb enough,
22 after what they have gone through in the November
23 3rd election, to then go toward January 5th in a
24 runoff and think that changing nothing will change
25 the outcome, then the people of Georgia aren't

1 half as smart as I believe them to be; and I
2 believe the patriots in Georgia should stop this
3 nonsense now.

4 It is not something that -- to be decided
5 about over who do you favor, which party, which
6 candidate. This is now about faith in the
7 electoral system in one specific state that may
8 control the destiny of this country; and by God,
9 it's too important for anyone -- and I don't care
10 what party you're in, I don't care whether you're
11 an independent -- this is too important to act as
12 if nothing happened on November 3rd. And to --

13 SIDNEY POWELL: Exactly.

14 LOU DOBBS: -- to pretend that there will
15 be a different outcome on January 5th. It's
16 idiotic. They --

17 SIDNEY POWELL: It is.

18 LOU DOBBS: -- the ridiculous leadership --

19 SIDNEY POWELL: I agree with you
20 completely.

21 LOU DOBBS: -- and I mean the governor and
22 the state -- Secretary of State have got to find,
23 if not the integrity, the -- the primal fear of
24 the voters in Georgia to stop what's going on and
25 stop it now.

1 SIDNEY POWELL: I agree with you
2 completely, Lou. This is the future of the
3 republic, whether we continue to exist as the
4 republic of the United States of America, and
5 every patriotic American needs to stand up right
6 now and make their voices heard that we will not
7 tolerate this. The chips need to fall wherever
8 they fall.

9 LOU DOBBS: Yeah.

10 SIDNEY POWELL: We lost gubernatorial
11 seats. I'm sure we lost Congressional seats. We
12 lost Senate seats that we should have had. They
13 have been perpetrating a fraud on the United
14 States for the last ten years telling us we were
15 turning blue, when we were not. We have been
16 clearly going red, because the American people
17 love this country, regardless of whether they came
18 from -- where they came from, American citizens
19 came here for freedom and justice and liberty for
20 all.

21 SIDNEY POWELL: Well, Sidney, I guess we're
22 going to conclude with my final question; we're
23 out of time, we've gone well over: What -- what
24 can be done right now, how much time do you need
25 to get that evidence to this broadcast and we'll

1 put it on the air?

2 SIDNEY POWELL: I will get you some more
3 information that's just stunning tonight.

4 LOU DOBBS: All right. Sidney Powell,
5 thank you for all you're doing. It is the Lord's
6 work.

7 Up next, Michigan's Attorney General can't
8 defend the legality of Michigan's vote; so we'll
9 talk with election fraud witness and whistleblower
10 Patrick Colbeck about why that is.

11 Be sure to get in the Christmas spirit,
12 visit Loudobbssshop.com. You can order my new book
13 The Trump Century as well. That's
14 Loudobbssshop.com. Seasons greetings.

15 (End of the recording.)

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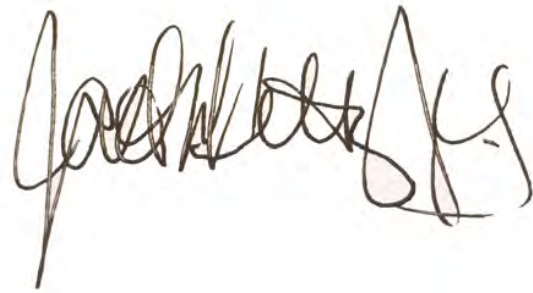
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Dated this 29th day of December, 2020.

A handwritten signature in dark ink, appearing to read 'Jackie Mentecky', is written over a horizontal line.

Jackie Mentecky

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Exhibit 28

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FILE NAME:

Exclusive Sidney Powell on 2020 Election Lawsuits, Supreme
Court Decision Gen. Michael Flynn Case
(25:19 min)

TRANSCRIPT OF VIDEO-RECORDED INTERVIEW

SIDNEY POWELL

JAN JEKIELEK

Transcribed By:
TERRI NESTORE
CSR No. 5614, RPR, CRR

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1 SIDNEY POWELL: We have them destroying evidence
2 right and left in Georgia, in Cobb County, Gwinnett
3 County, Fulton County, everything from shredding ballots,
4 to wiping machines and replacing servers. All of these
5 machines should have been impounded the day after the
6 election and reviewed for forensic analysis.

7 JAN JEKIELEK: Joining us today is attorney
8 Sidney Powell, who has been leading election lawsuits in
9 multiple states. On Friday she filed emergency requests
10 to the Supreme Court, asking the justices to order
11 officials in Georgia, Michigan, Wisconsin and Arizona to
12 decertify their 2020 election results.

13 We discuss the current status of the legal
14 challenges she's involved in, and her thoughts on the
15 Supreme Court's rejection of the Texas lawsuit, as well as
16 the conclusion of the Mike Flynn case.

17 This is American Thought Leaders and I'm Jan
18 Jekielek.

19 Sidney Powell, such a pleasure to have you back
20 on American Thought Leaders.

21 SIDNEY POWELL: Oh, thank you, Jan.

22 It's always great to be with you all.

23 JAN JEKIELEK: It's been a busy month for you.

24 I want to go back a little, before all the work
25 that you've been doing on the election, all these lawsuits

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1 that you've been working on, because the last time we
2 spoke we were actually speaking about the case that you
3 were working on with General Flynn and since that time,
4 this case seems to have finally been resolved.

5 There was the president pardoned General Flynn in
6 a kind of historic way, as far as I can tell, and at the
7 same time the judge ultimately dismissed the case.

8 SIDNEY POWELL: Yes. He still took his time to
9 do that and wrote an opinion he really has no basis to
10 write because he didn't have jurisdiction to write it at
11 the time, so we will be moving to vacate his gratuitous
12 slam and appalling opinion because he had no jurisdiction
13 or basis to write it.

14 JAN JEKIELEK: Okay. Well, so -- exactly.
15 So your reaction to the pardon, then?

16 SIDNEY POWELL: Well, it's unfortunate the
17 president had to issue it. We certainly appreciate him
18 doing that, but if the legal system had worked the way it
19 should have, if Judge Sullivan had been a real judge
20 instead of a tool of Eric Holder, we wouldn't have had to
21 have the pardon.

22 JAN JEKIELEK: It's an unusual pardon because
23 there is -- it isn't of someone that's necessarily guilty
24 here.

25 SIDNEY POWELL: Right. It was a pardon of

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1 innocence because the judicial system did not work.

2 It's that broken.

3 JAN JEKIELEK: How common is a pardon of
4 innocence?

5 SIDNEY POWELL: Not all that common. It's hard
6 enough to get a pardon to begin with, but I've been very
7 concerned over the last 20 years in particular, and in
8 writing Licensed to Lie, exposing corruption in the
9 Department of Justice that probably five to 10 percent of
10 our current prison population is actually innocent, and
11 another high percentage didn't have a trial fair enough to
12 tell whether they're guilty or innocent because we have so
13 many judges out there now that are result driven instead
14 of applying the rule of law like it should be.

15 And we have political prosecutions that never
16 should have happened in this country.

17 JAN JEKIELEK: So actually I'll recommend to our
18 viewership Licensed to Lie, you know, an incredible book
19 explaining how the -- I guess I've heard it described as a
20 prosecurocracy, or something like that.

21 SIDNEY POWELL: I hadn't heard that word.

22 It's a mouthful. It sounds like it works.

23 JAN JEKIELEK: Well, that the prosecutors in the
24 justice system have this incredible amount of power to,
25 you know, enter into pleading and so forth.

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1 SIDNEY POWELL: Yes, and there's definitely a
2 high number of what I would call self-interested
3 prosecutors that have taken on a life and mission of their
4 own, and they abuse the law in the process.

5 JAN JEKIELEK: So I think probably you've been a
6 little too busy to start working on this request for an
7 order to vacate, but so that's coming?

8 SIDNEY POWELL: Yes, that will be coming.

9 We will move to vacate Judge Sullivan's absurd
10 and nonjurisdiction-based decision.

11 JAN JEKIELEK: Okay, and so -- and what's going
12 to happen to Judge Sullivan now, in your mind?

13 SIDNEY POWELL: Well, if we had all the seats in
14 Congress that we should have had by virtue of a legitimate
15 election, there would be enough congressmen and senators
16 to impeach him.

17 One of the things I intend to do with
18 defendingtherepublic.org is examine all the elections
19 across the country that exhibited the same pattern of
20 fraud that we know happened in the swing states and work
21 to get the public and all the parties entitled to the
22 seats they actually won by legal votes.

23 That's going to take a while longer but it must
24 be done because we cannot have people sitting in our
25 Congress and House or in governorships to which they are

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1 not entitled because of the voting machine fraud.

2 JAN JEKIELEK: So let's talk about your court
3 cases that are currently in play.

4 You've actually filed emergency requests to the
5 Supreme Court to decertify the 2020 election results to
6 prevent the electors from casting their votes, in I think
7 four states now.

8 SIDNEY POWELL: Yes.

9 JAN JEKIELEK: Can you kind of break that down
10 for me, please.

11 SIDNEY POWELL: Yes. We've filed suits for the
12 process in Georgia, Wisconsin, Michigan and Arizona
13 because all those were fatally flawed by massive fraud in
14 every manner and means you can think of, but especially
15 insidious and troubling is the machine fraud conducted
16 through the Dominion Voting Systems.

17 In fact, one of our experts says Dominion fraud
18 was five percent higher votes for Biden across the board,
19 everywhere there was a Dominion machine running, and the
20 same was true for other democrats that were running on the
21 tickets in those states.

22 JAN JEKIELEK: But in these four states, you're
23 saying that it was just a whole nother level.

24 SIDNEY POWELL: Yes. There was an additional
25 level of fraud in those states. And we haven't had time,

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1 as you might imagine, to look at all the instances of
2 fraud that need to be investigated.

3 It makes me wonder where in the world is our FBI
4 and our Department of Justice, and I'm frankly very
5 concerned that this entire system was originated likely by
6 the CIA and maybe even given to Venezuela years ago or
7 seeded in different places that it wound up with
8 Venezuela, which started the Smartmatic and Dominion
9 companies, and the only reason they have a Boca Raton
10 address here in the United States is to try to make them
11 seem like any United States company, but they're not.
12 They're owned, run and were organized and created by
13 Venezuelan dictator Hugo Chavez, with his dirty money and
14 the dirty money of the Cuban communists to ensure he won
15 every election after it was used.

16 One of our witnesses was a direct firsthand
17 personal observer of all of that; received the briefings
18 on how it all worked, saw it work in the control room for
19 election after election, and has given us detailed
20 affidavit to explain it all.

21 There's people who say there's no evidence just
22 are lying through their teeth or they're deliberately
23 ignorant or willfully blind to the truth and frankly,
24 they're part of the problem. I mean, a lot of the people
25 who are saying there's no evidence are part of the problem

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1 and know damn well that all of this happened and may have
2 even instigated it, benefited from it, paid for it,
3 encouraged it.

4 JAN JEKIELEK: At this moment, you have basically
5 put in these emergency requests. At the same time, you
6 know, just moments earlier, the Supreme Court decided to
7 not take on this Texas suit, and so tell me a bit, what's
8 your reaction to that?

9 SIDNEY POWELL: Well, I have a mixed reaction to
10 it. I had some concern over the standing of the states to
11 raise the issues they were raising to begin with, but I
12 thought because it was a suit that the court had original
13 jurisdiction of, the court would and should take it at
14 least to look at it and address it more fully than they
15 did.

16 It has no effect on our cases because our
17 plaintiffs are electors who have constitutional standing
18 in the electors and elections clause of the Constitution,
19 so we will not have standing issues in the four cases that
20 I brought. The court really must address the merits.

21 Another case is also Lin Wood's case out of
22 Georgia, which is still before the court, and another case
23 out of Pennsylvania is also before the court. There might
24 be a standing issue in one of those, but between the
25 multiple cases that are there right now, someone has to

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1 have standing.

2 So one or more of those cases is going to have to
3 be addressed on their merits or we don't have a Supreme
4 Court.

5 JAN JEKIELEK: And maybe I'll just get you to
6 clarify, for the benefit of our viewership, this idea of
7 standing. I mean it's essentially that they have the
8 right to bring the case in the first place, but maybe you
9 can explain that a little more.

10 SIDNEY POWELL: Yes. To bring a case, you have
11 to be a party that suffered an actual injury as a result
12 of the conduct that is being complained of.

13 So, for example, the court was saying that Texas,
14 as a state, doesn't have a particular interest,
15 particularly in how other states run their elections, but
16 voters and electors should definitely have standing to
17 raise claims of vote dilution because electors are seated
18 as a result of the vote. In fact, in several states they
19 have the same standing as a candidate would have by State
20 law, they have rights and duties under their State laws,
21 and they have a special mention in the Constitution as
22 being constitutionally required for the process of the
23 Electoral College.

24 So I don't think there's any circumstance under
25 which any court can say an elector that we represent,

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1 multiple of in multiple states -- in fact Arizona, every
2 single elector in the state joined our suit.

3 So we have standing for all of the claims that we
4 have raised, beyond any doubt.

5 JAN JEKIELEK: Fascinating. Now talking about
6 Georgia, you've actually mentioned that some of the
7 counties didn't actually do a hand recount.

8 Now, you tell me more about this.

9 SIDNEY POWELL: Yes. They often ran the same
10 ballots through the same fraudulent creating machines,
11 which did absolutely no good whatsoever. They did not
12 look at each ballot and compare the signatures.

13 If we could even get a hundred thousand ballots
14 of the last hundred thousand ballots run in Georgia, for
15 example, we could show, by instant mechanical analysis,
16 the difference in the ballots and the ink.

17 We know that there were hundreds of thousands of
18 fraudulent ballots imported into the country, likely from
19 China. We have video of some coming across the border
20 from Mexico. There's other information of ballots being
21 shipped from one state to another. In fact, there was a
22 postal service driver, I think, who was sent from New York
23 to Pennsylvania in the middle of the night with a
24 truckload of ballots that was then used to, quote,
25 backfill, end quote, the vote count.

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1 It's absolutely absurd.

2 We have more evidence coming in today of a
3 massive load of ballots, I think from Arizona to Georgia.

4 So they had these warehouses of counterfeit
5 ballots in different parts of the country, apparently, and
6 then shipped 'em in the middle of the night, as needed, to
7 backfill in the states where President Trump's voters
8 poured out in such great number that they broke the
9 algorithm they had preprogrammed in the computers for
10 Dominion to create the fraud.

11 That's why they had to stop counting in five
12 states and that's why it's absolutely absurd to say that
13 there wasn't voter fraud here. We have counterfeit
14 ballots, we have dead people voting by the thousands, if
15 not hundreds of thousands. There were something someone
16 called phantom voters. There were just more manner and
17 means of fraud than any law abiding American citizen could
18 possibly imagine. It's stunning. It's absolutely
19 stunning. And they were so in our face with it, and then
20 to deny it is purely Machiavellian.

21 JAN JEKIELEK: Tell me a little more about these
22 four cases. I assume that they're similar, right, in
23 nature or I understand they're similar in nature.

24 Can you tell me a bit about how those cases work
25 that are before the Supreme Court now.

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1 SIDNEY POWELL: Well, each case discusses in
2 detail the facts that relate to the state in which it
3 arises from, in some specific detail.

4 Then we also allege common claims. It's, for
5 example, the voter dilution and denial of equal protection
6 under the Constitution is one of the claims that we raised
7 in each, because every fraudulent ballot destroys the vote
8 of a legal voter and effectively what they did with the
9 machine fraud was to -- they did everything from injecting
10 massive quantities of votes into the system that they just
11 made up or running counterfeit ballots through multiple
12 times, in multiple batches, to create the appearance of
13 votes that weren't really there.

14 They trashed votes. They had this thing called
15 an adjudication system where they could program the
16 computer -- even by their own manual they explained this
17 -- they can program the computer to reject ballots for any
18 number of reasons. We think that's what the whole Sharpie
19 thing was that happened in Arizona and another state too,
20 where if the vote was cast with a Sharpie, the machine
21 would automatically kick the vote to an adjudication file,
22 they called it, and then the people running the machines,
23 the computers, could simply take that whole adjudication
24 file that had hundreds of thousands of Trump votes in it
25 and drop it, trash it. Or flip it to Biden.

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1 And that happened all across the board.

2 JAN JEKIELEK: Yeah, and that's very interesting
3 because I understand that basically what you found is that
4 larger than expected numbers of these votes would become
5 adjudicated and when they become adjudicated, that's what
6 creates the potential for changing the votes.

7 Do I understand that correctly?

8 SIDNEY POWELL: That's one of the ways.

9 Another way they did it was to shave votes. The
10 machine can weight the ballots. So they can give Biden
11 votes a weight of 1.25 count and Trump votes are reduced
12 to a .75 count. So they flip 25 percent of the votes for
13 Biden automatically; just every vote count, instead of a
14 vote counting at one, which is all a vote should ever
15 count as, one vote -- one man, one vote, that's our
16 standard, long held rule -- the only way it can work in a
17 democrat republic -- and instead, if you voted for Biden
18 you got a 1.25; if you voted for Trump, you got .75.

19 And we can see, in some of the readouts, that's
20 exactly what happened. You can go back, the
21 mathematicians can go back and figure out the algorithm
22 that was run by precinct, even.

23 JAN JEKIELEK: It's just incredible, right, to
24 hear.

25 So, you know, there's all these people out there

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1 saying, especially among the corporate media and so forth,
2 look, look, all these lawsuits keep getting thrown out.

3 Clearly there's nothing there.

4 How do you respond to people like that?

5 SIDNEY POWELL: Well, it's very concerning, Jan,
6 because this is obviously not the first time this has
7 happened. It's the first time it's happened on this
8 scale, but I've been given a massive quantity of data from
9 California in 2016 that shows it happened there, that
10 Clinton did the same thing to Bernie Sanders there and I
11 have a witness who told me that they informed Bernie
12 Sanders of all of it and instead of outing it, he sold
13 out.

14 So the monied interests, the political interests,
15 the global power elites, have been doing this all around
16 the world wherever they wanted to for at least 15 or
17 20 years. Our own government has been involved in some of
18 it. It cuts across political lines. There are some
19 republicans, no doubt, who benefited from it, just as
20 democrats have. They're all playing the game.

21 I feel more every day like The Matrix movie was
22 real. It's that bad. It's that bad.

23 I mean, we know that Chavez -- well, we know that
24 Carolyn Maloney, for example, was complaining about it --
25 I think it was 2006, wrote a letter to the Secretary of

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1 the Treasury, I think, and other people, expressing
2 concern over this Venezuelan owned company that's running
3 American elections.

4 And CFIUS approved it. So we need to look at who
5 was on the CFIUS board then, you know, the heads of all
6 the major agencies that approved this to begin with.

7 One of the things Dominion gets people with is
8 what I would call election insurance. You know, if you
9 put in the Dominion system, you know, you're going to win.
10 Reelection is no problem at all. And that's what Hugo
11 Chavez had it rigged for. The fact that people are
12 willing to turn a blind eye for this is just horrifying.

13 JAN JEKIELEK: You know, and that's actually, I
14 guess, an analysis that could be run, to see how often the
15 incumbent that would put in the system subsequently won.

16 SIDNEY POWELL: Exactly.

17 JAN JEKIELEK: That would be interesting, to see
18 that.

19 SIDNEY POWELL: Exactly.

20 JAN JEKIELEK: You know, I was going to ask you,
21 you know, what motivates you but as you're describing
22 this, I can probably guess. I mean, these are --

23 SIDNEY POWELL: It's all about the truth. If we
24 are going to be a free country, we have to have honest
25 elections. They have been doing this to American citizens

1 and other countries around the world for at least
2 15 years.

3 Venezuela hasn't had a free election since Hugo
4 Chavez did the whole Smartmatic-Dominion voting system
5 thing. They exported it to other countries. It's been
6 used all around the world. The Philippines.

7 I mean, I have people writing me from other
8 countries all the time saying, you're not just helping the
9 United States of America, you're helping anyone who wants
10 to be free in the entire world.

11 And the people responsible for this need to be in
12 prison worse than 90 percent, probably, of the people who
13 are there. This is awful.

14 I mean there aren't even words sufficient to
15 describe how evil, insidious and malevolent this is.

16 JAN JEKIELEK: Why do you think there's been so
17 many rejections of these suits in the courts?

18 SIDNEY POWELL: Because the corruption goes deep
19 and wide. They have threatened people's lives, they have
20 threatened people's children. We have the very unusual,
21 quote, car wreck, end quote, that involved one of Kelly
22 Loeffler's regional campaign workers in Atlanta, just a
23 few days around the time of our suit.

24 Our judge in Atlanta gave us the preliminary
25 injunction we wanted, and 20 minutes later completely

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1 reversed it.

2 JAN JEKIELEK: There's actually work being done
3 as we speak, as I understand it, doing a kind of forensic
4 analysis of some of these Michigan machines, like some 20
5 of them -- I can't remember the exact details right now --
6 that you may be aware of.

7 SIDNEY POWELL: Yes. That is not my lawsuit,
8 it's an independent patriot that filed that lawsuit. He's
9 done a great job with it and there's apparently a judge
10 there with fortitude and integrity. It takes both. I
11 think they go hand in hand.

12 But he has ordered the forensic examination of
13 those machines, which is what should be happening on every
14 Dominion machine in the country right now. Every federal
15 judge should have ordered them impounded and reviewed
16 forensically; and frankly, it should happen in other
17 states too because our witness said that the DNA of the
18 code is in all the other systems also. It's not just
19 Dominion. Every voting machine in the country should be
20 checked for its validity and its ability to do exactly
21 what the Dominion machines have done here and to see
22 whether it was done in this election.

23 We have them destroying evidence right and left
24 in Georgia, in Cobb County, Gwinnett County, Fulton
25 County. It's everything from shredding ballots, to wiping

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1 machines and replacing servers.

2 All these machines should have been impounded the
3 day after the election and reviewed for forensic analysis
4 but I think the analysis is going to come from Michigan,
5 it's going to prove exactly what we have been saying was
6 happening with these machines.

7 They did a real hand count in one small county in
8 Georgia and found a significant vote flip, I think it was
9 about .26 of vote flip from Trump to Biden in that one
10 county where they actually did a real count.

11 And Coffee County, Georgia, just refused to
12 certify its results from the election because of what they
13 found as obvious fraud.

14 JAN JEKIELEK: So at this point, what would it
15 take to get, you know, this broad assessment or analysis
16 of machines to actually happen?

17 SIDNEY POWELL: Well, given the level of foreign
18 interference we can demonstrate and the country has
19 evidence of in our filings of foreign interference in the
20 election, it's more than sufficient to trigger the
21 president's executive order from 2018 that gives him all
22 kinds of power to do everything from seize assets to
23 freeze things, demand the impoundment of the machines.

24 I think under the emergency powers he could even
25 appoint a special prosecutor to look into this, which is

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1 exactly what needs to happen.

2 Every machine, every voting machine in the
3 country should be impounded right now. There's frankly
4 more than enough criminal probable cause to justify that,
5 for anybody who's willing to address the law and the facts
6 purely on the basis of truth and not politics or corporate
7 greed or global wealth.

8 JAN JEKIELEK: You know, and that's interesting
9 that you mention that executive order because I understand
10 there's also a report that DNI Ratcliffe is supposed to be
11 preparing to come out in not too long from now -- it's
12 45 days, I believe, from the time of the election -- about
13 prospective issues.

14 SIDNEY POWELL: Right. And what happened in the
15 election. Well, if that report is an honest report, it's
16 going to blow the mind of every citizen in the country
17 who's willing to look at the truth and the facts because
18 there's never -- we've never witnessed anything like this
19 in the history of this country, and it's got to be stopped
20 right now or there will never be a free and fair election.

21 JAN JEKIELEK: So this is what you mean when you
22 say you feel the republic is at stake?

23 SIDNEY POWELL: It is, absolutely. Any election
24 from hereon out is an absolute farce and a joke and a
25 manipulated charade if we don't fix this right now and

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1 come up with a system that we can all trust.

2 There should be nothing but transparency in an
3 election in the United States of America, and the very
4 fact that they are refusing to let people look at the
5 machines or address any of these issues tells us it's one
6 big fraud.

7 JAN JEKIELEK: Well, no, exactly, and it's kind
8 of fascinating because you would feel like anybody would
9 want to be able to actually know the reality of the
10 situation.

11 SIDNEY POWELL: Exactly. As my friend Lin Wood
12 says, if people have nothing to hide, they hide nothing.

13 JAN JEKIELEK: So Sidney, any final thoughts
14 before we finish up?

15 SIDNEY POWELL: Just to say that we must fix
16 this, we must fix it now, and the American people must
17 demand it. We cannot settle for anything like what we've
18 witnessed in the last four years.

19 The conduct of the democrats, the global elites,
20 the power brokers for the last four years, in their effort
21 to destroy President Trump -- and this is not about
22 President Trump, he's just a symbol of we the people.

23 It's about the future of the republic.

24 We have to fix this. We have to fix it right now
25 and there should never be another election conducted the

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1 way this one was. There should never be another American
2 election without complete transparency.

3 JAN JEKIELEK: Sidney Powell, such a pleasure to
4 have you on again.

5 SIDNEY POWELL: Thank you, Jan.

6 (End of recording.)
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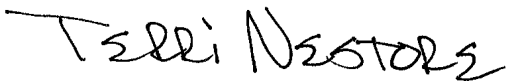
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C E R T I F I C A T E

I, TERRI NESTORE, Certified Shorthand Reporter/
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shorthand notes, to the best of my ability, taken while
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I further certify that I am not of counsel or
attorney for either or any of the parties to said
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this cause, and that I am not related to any of the
parties thereto.

Dated this 18th day of December, 2020.



TERRI NESTORE, CSR 5614, RPR, CRR

Exhibit 29

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FILE NAME:
Sidney Powell Kraken Released in MI; SCOTUS Next
(13:34 min)

TRANSCRIPT OF VIDEO-RECORDED INTERVIEW

SIDNEY POWELL

JOHN FREDERICKS

Transcribed By:
TERRI NESTORE
CSR No. 5614, RPR, CRR

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1 JOHN FREDERICKS: Joining us now is Sidney
2 Powell. Sidney is the lawyer, as you know, that has
3 brought a number of lawsuits in a number of states;
4 Arizona, Michigan, Wisconsin, Georgia being one of them.

5 She got some favorable rulings over the weekend
6 that we wanted to go into and have her outline now exactly
7 where she is, give us up-to-date Sidney Powell.

8 Sidney, thanks for being with us today. We're
9 live in McDonough, Georgia.

10 SIDNEY POWELL: Well, thank you, John. I hope
11 things get cleaned up in Georgia fast because there's no
12 point in voting on machines that commit fraud, and that's
13 what the Dominion machines do. They can read the ballots,
14 change the ballots, flip votes from Trump to Biden or from
15 Kelly Loeffler to her opposition. They can override
16 signatures. We have evidence that they put massive
17 numbers in what they call an adjudication file and by
18 Dominion's own technical manual, you can do whatever you
19 want to with the adjudication file.

20 The evidence that we expect to be coming out in
21 about Michigan today is absolutely stunning. It's a State
22 court case brought by a local practitioner up there who
23 has a lot of courage and integrity to seek the -- to fix
24 the problem that he saw in Antrim County, Michigan, and we
25 expect that evidence to be useful in every other suit in

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1 the country. We have four cases pending in the Supreme
2 Court right now arising from the election fraud in
3 Arizona, Michigan, Wisconsin and Georgia.

4 We filed a letter with the Supreme Court
5 yesterday advising them of expected new evidence coming
6 from Antrim County, Michigan, that case, and also from
7 another expert witness that we have that shows dramatic
8 instances of foreign interference in our election, and
9 that triggers the president's executive order that he
10 entered on in, I think it was September 2018 or so, that
11 requires immediate action to protect the national security
12 interests of the United States because of the interference
13 in the election by foreign actors.

14 JOHN FREDERICKS: So Sidney, tell us about your
15 case. Let's get these one at a time here. Let's go
16 through the Georgia one. You've got four cases pending.

17 What are the chances that SCOTUS actually grants
18 you a hearing here?

19 SIDNEY POWELL: Well, I don't know that they have
20 to grant a hearing, per se. They can act on it with the
21 papers because we're asking for emergency relief, a
22 decertification and a stay of the seating of the Electoral
23 College designates because Trump designates should be
24 deciding the issues here and voting for President Trump.

25 The results in the elections were actually

1 overwhelming for Trump, and it's imperative that the
2 proper electors be seated.

3 We have standing, unlike Texas did, because we
4 represent the actual electors who are named in the
5 Constitution. They have a constitutional role in the
6 process and have the same standing as would a candidate
7 himself. So there's no issue of standing in the case.

8 There are clear injuries.

9 So we pass all the procedural tests that the
10 court might want to impose, and the issue could not be one
11 of any greater importance for not only the country but
12 frankly, the free world. Americans voted for freedom in
13 this election. They voted to keep the United States of
14 America a free country, enabled to determine its own
15 destiny, instead of a global pawn.

16 JOHN FREDERICKS: What would a favorable ruling
17 be? What are you looking for out of SCOTUS? I know two
18 of your four cases, they decided to get on the docket.

19 Just explain it in laymen's terms, Sidney, what
20 that means.

21 SIDNEY POWELL: Well, they're all on the docket,
22 all four are on the docket, but nothing has been decided
23 yet. We're asking them essentially to stop the train
24 because it can't proceed to the station in the current
25 condition of being totally infected with fraud.

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1 JOHN FREDERICKS: So a favorable ruling would be
2 that they do what? They suspend -- walk us through what,
3 in your mind, now, today or tomorrow, would -- it would
4 have to be today -- would be a favorable ruling.

5 SIDNEY POWELL: If they say stop, that you can't
6 proceed with the Electoral College process right now.

7 JOHN FREDERICKS: And that would be based on the
8 evidence that you presented to them.

9 And so what would their other option be?

10 To dismiss it again? Can they do that?

11 SIDNEY POWELL: Well, yeah, I guess. They're the
12 Supreme Court, they can do whatever they decide to do but
13 that would certainly be the wrong result in this
14 situation, because there's no procedural basis on which
15 they could legitimately dismiss it.

16 They can always decide not to grant something but
17 again, with the importance of the issues to the entire
18 country, it would be horrific if the court didn't accept
19 these cases.

20 JOHN FREDERICKS: Tell us about Antrim County in
21 northern Michigan where this one fellow up there, I think
22 his name is DePerno filed this suit, and basically they
23 went and did the forensic analysis of these Dominion
24 machines, they have the results back, the State of
25 Michigan blocked them from releasing it.

1 Where are we on that? Explain that.

2 SIDNEY POWELL: Yes. Well, there was a hearing
3 this very morning -- in fact it started right now and I've
4 got to get back to it pretty quick here, but he's deciding
5 whether to release the report and take it out from under
6 the protective order and make it public.

7 I think he is the kind of judge that will do
8 this, because it couldn't be more important. The world
9 needs to know what happened here because it's happened in
10 other countries around the world too. I have people
11 writing me from all around the world, saying this happened
12 here, the Philippines, in any number of countries.

13 And Venezuela of course, you know, the system for
14 Dominion and Smartmatic that caused this fraud came from
15 Venezuela and was created to ensure the victories of Hugo
16 Chavez, the dictator, and then of course Maduro has
17 benefited from it, and they have sold it all over the
18 place.

19 JOHN FREDERICKS: You would expect that to be
20 released. Why would the State of Michigan fight the
21 release of this evidence? Like if there's no evidence
22 there, wouldn't they want it out, Sidney?

23 SIDNEY POWELL: Exactly, yes. As my friend
24 Lin Wood says, he who has nothing to hide, hides nothing.
25 Well, obviously the Secretary of State certified a

1 fraudulent election in Michigan. It's going to be
2 extremely clear that that happened. It's going to be
3 irrefutable, and they know it. They know exactly what
4 they did. This was deliberate, and there are certain
5 public officials in different states that know exactly
6 what happened here.

7 Some didn't. The local people probably had no
8 idea what was going on until they saw different tabulator
9 results, but some people definitely did and that's why
10 Dominion was in certain states.

11 In fact, one of our experts -- and we have this
12 evidence attached to the exhibits at sidneypowell.com, at
13 defendingtherepublic.org, at kraken-wood.com, all of which
14 people have attacked and tried to take down -- and Twitter
15 won't even let us link kraken-wood.com on a Twitter -- on
16 a tweet and they took down our Kraken-Wood Twitter account
17 immediately. We got an instant 150,000 or so followers,
18 and they took it down the next day.

19 So there's huge efforts to suppress the truth
20 here. The social media companies, the media companies,
21 they are all part of the big problem and wanting to
22 control the country by a fraudulent vote.

23 It's really one of the -- it's the greatest crime
24 of the century, if not the life of the world.

25 JOHN FREDERICKS: You expect the hearing in

1 Michigan at 8:30. Now I know you have to get back to
2 that, so you're expecting the favorable ruling there would
3 be the judge simply overturns the injunction and allows
4 the evidence or allows the findings to be released?

5 SIDNEY POWELL: Yes.

6 He just makes the report public.

7 JOHN FREDERICKS: What is the harm in that?

8 Just make it public.

9 SIDNEY POWELL: Exactly. Because the public's
10 entitled to know how bad it is, and the Secretary of State
11 is obviously fighting that tooth and nail, as no doubt
12 will Smartmatic and Dominion, because they've been telling
13 everybody there's nothing wrong and that's a bald faced
14 lie.

15 JOHN FREDERICKS: They don't want the results out
16 because -- and they're arguing that it violates their
17 contract with the states, that they have proprietary
18 software they don't want to get out.

19 So basically you've got these secretaries of
20 state and attorney generals arguing on behalf of a
21 software company, in opposition to its own people.

22 SIDNEY POWELL: Yes. And they shouldn't have
23 signed any contract, for example, that doesn't allow
24 transparency. If you don't have a transparent election
25 system, you don't have an election system and that's

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1 exactly the position we're in. This was rigged from the
2 get-go, and everybody that was part of that knew it.

3 JOHN FREDERICKS: Where are we with the machines
4 in Ware County, Georgia, that Garland Favorito brought to
5 everybody's attention with their 37 votes that changed
6 from Trump to Biden?

7 SIDNEY POWELL: Which was a -- the same
8 percentage we're seeing changed in many other places.
9 It's a 1.26 weighting. What the Dominion machines can do
10 is instead of registering one vote for each candidate,
11 they can go in and they can weight the vote.

12 So a vote for Biden counts as 1.26 points and a
13 vote for Trump only counts as .74. So they do essentially
14 a 25 percent shift in the votes that causes twice that
15 amount, in terms of a flip.

16 It's really quite a remarkable process.

17 Just as criminal as it can possibly be.

18 JOHN FREDERICKS: And all you're looking for is
19 for this information to get out to the public.

20 Tell us about -- I know we're short on time --
21 tell us about your lawsuit in Wisconsin.

22 Where are we in Wisconsin?

23 SIDNEY POWELL: Everything -- Wisconsin, Arizona,
24 Michigan and Georgia are all right now pending emergency
25 petitions in the Supreme Court to get the process stayed,

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1 and that's enough states to flip the count for President
2 Trump and stop the Electoral College process from
3 proceeding on the basis of a massive fraud.

4 JOHN FREDERICKS: And that's going to be decided
5 on -- that has to be decided on today or what's the time
6 frame?

7 SIDNEY POWELL: Well, that would certainly be the
8 best course, but fraud will vitiate any sort of finding at
9 any time. The sooner the better, obviously, but this
10 election cannot proceed on the process, in the face of
11 this massive fraud.

12 It's a huge criminal fraud, it's a national
13 security violation. The foreign interference triggers the
14 president's authority under the executive order of 2018,
15 and also the cyber attacks on the country. This is part
16 of the cyber war that foreign actors are waging against
17 the United States. It's got to be brought to a screeching
18 halt now, and the election cannot proceed on the basis of
19 this massive fraud.

20 JOHN FREDERICKS: Sidney Powell with us.

21 Sidney Powell, as you know, the lawyer that has
22 brought all these suits, along with Lin Wood.

23 Sidney, so is it fair to say that if one state
24 falls, they're all going to fall?

25 SIDNEY POWELL: Yes.

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1 JOHN FREDERICKS: Because all the evidence is the
2 same, basically, right?

3 SIDNEY POWELL: Yes, it's -- yes. There are
4 different kinds of specialized fraud in some of the
5 states, but in terms of the Dominion machine fraud, yes,
6 it's going to be the same everywhere and yes, multiple
7 states should fall because of this fraud.

8 JOHN FREDERICKS: And so it's going to be up to
9 the Supreme Court of the United States that all of these
10 four you have filed, they're all in the docket and they
11 have to rule on each state individually or will it be a
12 blanket ruling?

13 SIDNEY POWELL: They could do it -- they could
14 take them together, and they could take them together also
15 with a Pennsylvania case that's pending there. In fact,
16 there might be two Pennsylvania cases still pending, and
17 with Lin Wood's individual case from Georgia, which raises
18 the issue of the fraudulent absentee ballots, 1.3 million
19 of them, I think, subject to all kinds of violations,
20 particularly equal protection and the issue with respect
21 to coming in late and not being -- their signatures not
22 being verified.

23 I hate to cut you off, John, but I've got to get
24 back to this hearing.

25 JOHN FREDERICKS: Hey, Sidney, I want to thank

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1 you. Thank you for that update and thank you for being
2 with us and thank you so much. Sidney Powell.

3 SIDNEY POWELL: My pleasure.

4 JOHN FREDERICKS: John Fredericks.

5 SIDNEY POWELL: John, thank all your listeners
6 for caring about it, and we've got to start talking about
7 these issues and getting all our neighbors informed.

8 (End of recording.)
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C E R T I F I C A T E

I, TERRI NESTORE, Certified Shorthand Reporter/
Transcriptionist, do hereby certify that I was authorized
to transcribe the foregoing recorded proceeding, and that
the transcript is a true and accurate transcription of my
shorthand notes, to the best of my ability, taken while
listening to the provided recording.

I further certify that I am not of counsel or
attorney for either or any of the parties to said
proceedings, nor in any way interested in the events of
this cause, and that I am not related to any of the
parties thereto.

Dated this 17th day of December, 2020.



TERRI NESTORE, CSR 5614, RPR, CRR

Exhibit 30

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FILE NAME:
Sidney Powell to Newsmax TV -
Dominion Designed to 'Rig Elections'
(9:46 min)

TRANSCRIPT OF VIDEO-RECORDED INTERVIEW

SIDNEY POWELL

GREG KELLY

Transcribed By:
TERRI NESTORE
CSR No. 5614, RPR, CRR

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1 GREG KELLY: Folks, we got some news out of
2 Michigan, and this could be very significant. From the
3 Detroit -- well, actually we'll go to Jenna Ellis first.

4 Breaking this evening, the County Board of
5 Canvassers in Wayne County, Michigan, refused to certify
6 the election results. If the State Board follows suit,
7 the republican State legislator will select the electors.
8 Huge win for Donald Trump.

9 Very, very interesting. They found major
10 problems with -- let's see here -- absentee voting
11 precincts didn't match the number of ballots cast, the
12 ballots between August and November are not an exact
13 comparison but look, there's a lot here and we've got the
14 perfect person, Sidney Powell, standing by, member of
15 President Trump's legal team.

16 Sidney, welcome. And I know you've been handling
17 a lot of the Georgia situation and Dominion but your
18 reaction to the situation in Michigan, please.

19 SIDNEY POWELL: Well, that's an excellent
20 development and I would expect the entire Michigan Board
21 to reject the counts from the ballots. The election could
22 not have been more rigged than it was and I think it also
23 affected the race of Senator John James. The same
24 patterns fall there. We're still doing statistical
25 analysis of that race. But this -- the math just doesn't

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1 add up for anything, and we know Dominion has a long
2 history of rigging elections. That's what it was created
3 to do, to begin with.

4 We've introduced the affidavit of the person who
5 worked with Maduro, a high-ranking military officer who
6 saw it all happen and explained how it worked, and it's
7 out for the public to see on my Twitter feed
8 @sidneypowell11, so don't tell me there's no evidence of
9 fraud.

10 We've got increasingly mounting evidence of
11 significant fraud across multiple states that casts into
12 question the validity of elections in every swing state,
13 including Nevada and Arizona and Michigan, Wisconsin,
14 Georgia, and it went beyond that too.

15 GREG KELLY: You know, regarding Dominion, you've
16 raised this and we saw the letter last night. People like
17 Elizabeth Warren, Amy Klobuchar have raised significant
18 concerns about Dominion. Now they're trying to make it
19 seem like a right wing wacko conspiracy concern, even
20 though people like PBS were raising serious issues about
21 Dominion just before the election.

22 I heard you say today Dominion, the software was
23 actually designed to be hacked and I'm looking at one of
24 the agreements they had with the County of Santa Clara on
25 -- this is a contract between them and Dominion:

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1 Item 226. Allows staff to adjust tally based on review of
2 scanned ballot images. Look, you're the lawyer, I'm no
3 tech expert, but that sounds very, very funky to me.

4 SIDNEY POWELL: And worse than that, it had a
5 backdoor so it could be manipulated by anyone who could
6 access it through that backdoor, and that was a deliberate
7 feature.

8 The affidavit of the young military officer we
9 provided yesterday to the public explains how it was
10 created for that very purpose so Maduro -- I mean so Hugo
11 Chavez would never lose another election, and he did not
12 after that software was created. He won every single
13 election, and then they exported it to Argentina and other
14 countries in South America and then they brought it here.

15 And it's a foreign company, no matter how you
16 look at it, so they've already violated the president's
17 order against foreign interference in our elections. Our
18 votes were actually eventually counted in Barcelona,
19 Spain, or Frankfurt, Germany, on foreign servers.

20 It's absolutely stunning, and what's really
21 stunning is the effort that is being mounted against
22 getting the truth out on this, but you have to realize
23 that every tech company, every media company, every social
24 media company, scads of globalist corporations have been
25 doing business in countries with these dictators that have

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1 been installed through this rigged election system for
2 decades. The corruption is actually worldwide.

3 It is going to upset a countless number of
4 elections across this country and around the world, but we
5 need to do that to get rid of the corruption.

6 GREG KELLY: It does make a lot of sense now how
7 Joe Biden campaigned, i.e., not campaigning. Their team
8 seemed to know something. If this is true about
9 Dominion -- and I suspect it is -- by the way, regarding
10 -- well, okay. So we have these concerns, you've got your
11 whistleblower. Who do you bring this to? What happens
12 next? What body do you have to implore to take action?

13 SIDNEY POWELL: Well, we can add a fraud claim to
14 any of the states in which litigation has already been
15 filed, as soon as we can get the rest of the material
16 together that I'm still in the process of collecting
17 because frankly, witnesses are coming forth every day that
18 are fed up with the corruption in Dominion and the states
19 and the counties and the country.

20 So we're intaking information at an amazing level
21 of people who want to stop this and are absolutely fed up
22 with it.

23 GREG KELLY: You mentioned --

24 SIDNEY POWELL: We've got the evidence from the
25 own mouths of the guy who founded the company. I haven't

1 even had a chance to get that out to the public yet but
2 they admit -- the founder of the company admits he can
3 change a million votes, no problem at all.

4 GREG KELLY: The founder of Dominion admitted a
5 long time ago? Recently to you? Tell us more, please.

6 SIDNEY POWELL: Publicly. I will tweet out the
7 video later and I'll tag you in it.

8 GREG KELLY: Please do, @gregkellyusa, if you
9 don't mind. That's pretty wild.

10 Oh, by the way, what can you tell us about -- you
11 mentioned the whistleblower. There is a whistleblower.

12 Remember, whistleblowers who are against
13 President Trump are held as heros and defied.

14 What can you tell us about this individual?

15 SIDNEY POWELL: The one who gave us the
16 affidavit?

17 GREG KELLY: Yes.

18 SIDNEY POWELL: He was a high-ranking military
19 officer, he was very close to Hugo Chavez and he is just
20 absolutely disgusted with what he's seen and was
21 participating in when he was with Mr. Chavez. He saw how
22 it all worked. He was at meetings where it was fully
23 briefed and he wants this country to not fall prey to the
24 same corruption and tactics that were used in Venezuela.

25 GREG KELLY: I'm sorry, is he an American

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1 military officer or a Venezuelan military officer?

2 SIDNEY POWELL: He was a Venezuelan military
3 officer. He lives in this country now.

4 GREG KELLY: And you mentioned the CIA today. I
5 heard you during a radio appearance. You want the CIA
6 director fired. It seemed a little bit off topic and off
7 message, but what's the tie-in, if you don't mind?

8 SIDNEY POWELL: The tie-in is that there's no way
9 these programs could have been run around the world to
10 affect elections without the CIA. We also have had people
11 disclose to us the whole Hammer program that was created
12 for the CIA; and Scorecard, which is essentially the same
13 thing. It seems like every country has used something
14 like this to do what it wants to do, supposedly ours was
15 invented to influence foreign elections, but that too
16 could have been turned on this election.

17 It's all part of the same part and parcel of
18 government interference in elections to make choices
19 against the will of the people, and the will of the people
20 in this country was that Donald Trump win in a landslide,
21 if we can get to the bottom of it -- and I am determined
22 to do that -- I think we'll find that he had at least
23 80 million votes. The only reason the glitches happened
24 in the system was because he was so -- had so far many
25 more votes than they had calculated in advance, their

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1 algorithms wouldn't perform the functions they had
2 originally performed or were set to perform. They
3 couldn't make up the vote count, he had gotten so many
4 hundreds of thousands more than they planned.

5 So that's when they had to stop the counting and
6 come up with a way to backfill the votes or destroy votes
7 for Trump while they fabricated votes for Biden.

8 GREG KELLY: Sidney Powell -- who is a former
9 federal prosecutor, by the way, spent ten years working
10 for the federal government, good luck.

11 And by the way, very quickly, you have evidence,
12 it's coming in fast. There is a reason for not making it
13 public, correct? I mean, you're going to have a hostile
14 media picking it apart, possibly trying to destroy your
15 case before you can even make it. Is that part of your
16 thinking? Very briefly, if you don't mind.

17 SIDNEY POWELL: Well, not really. It's a matter
18 of collecting it in the right form and format to be
19 admissible. And we have witnesses that are scared. We
20 have witnesses that are afraid for their lives, afraid for
21 their families back in Venezuela. There are all kinds of
22 concerns. People have been threatened, and it's very
23 serious. We're talking about trillions of dollars of
24 worldwide wealth here that was all corrupt, and every
25 force in the world except 80 million voters, we the people

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1 and my little team, seem to be against us.

2 GREG KELLY: Well, millions are praying for you
3 and with you, and find her on Twitter -- the least we can
4 do -- sidneypowell1 -- @sidneypowell1, the numeral 1.

5 We appreciate it so much.

6 Good luck, and please stay safe.

7 SIDNEY POWELL: Thank you, Greg. You too.

8 GREG KELLY: All right. Take care now.

9 Good stuff.

10 (End of recording.)

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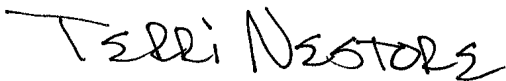
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C E R T I F I C A T E

I, TERRI NESTORE, Certified Shorthand Reporter/
Transcriptionist, do hereby certify that I was authorized
to transcribe the foregoing recorded proceeding, and that
the transcript is a true and accurate transcription of my
shorthand notes, to the best of my ability, taken while
listening to the provided recording.

I further certify that I am not of counsel or
attorney for either or any of the parties to said
proceedings, nor in any way interested in the events of
this cause, and that I am not related to any of the
parties thereto.

Dated this 18th day of December, 2020.



TERRI NESTORE, CSR 5614, RPR, CRR

Exhibit 31



Donald J. Trump ✓
@realDonaldTrump

Important News Conference today by lawyers on a very clear and viable path to victory. Pieces are very nicely falling into place. RNC at 12:00 P.M.

7:59 AM · Nov 19, 2020 · Twitter for iPhone

65.7K Retweets **10.9K** Quote Tweets **328.6K** Likes



Exhibit 32

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FILE NAME:
Trump Campaign News Conference on Legal Challenges
(1:32:28 hour)

TRANSCRIPT OF VIDEO-RECORDED NEWS CONFERENCE

RUDY GIULIANI
SIDNEY POWELL
JENNA ELLIS
JOE diGENOVA
VICTORIA TOENSING
BORIS EPSHTEYN

Transcribed By:
TERRI NESTORE
CSR No. 5614, RPR, CRR

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1 NARRATOR: The Trump campaign gave an update on
2 their legal challenges to the election results from the
3 headquarters of the Republican National Committee.

4 Rudy Giuliani, personal attorney for President
5 Trump, said the campaign would likely file a lawsuit in
6 Georgia, and we're looking into filing lawsuits in
7 New Mexico and Virginia. This is 90 minutes.

8 RUDY GIULIANI: Good afternoon, and thank you
9 very much for coming.

10 This is representative of our legal team. We're
11 representing President Trump and we're representing the
12 Trump campaign. When I finish, Sidney Powell and then
13 Jenna Ellis will follow me, and we will present in brief
14 the evidence that we've collected over the last -- I guess
15 it is two weeks. Also, Joseph diGenova and Victoria
16 Toensing are here with me. There are a lot more lawyers
17 working on this, but we're the -- I guess we're the senior
18 lawyers. And Boris Epshteyn.

19 So I guess the best way to describe this is when
20 we began our representation of the president, we certainly
21 were confronted with a very anomalous set of results.

22 The president, way ahead on election night, 7 or
23 800,000 in Pennsylvania, somehow he lost Pennsylvania.

24 We have statisticians willing to testify that
25 that's almost statistically impossible to have happened in

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1 the period of time that it happened.

2 But of course that's just speculation.

3 As we started investigating, both our
4 investigations and the very patriotic and brave American
5 citizens that have come forward are extraordinary;
6 extraordinary number of people, extraordinary number of
7 witnesses, and what emerged very quickly is, is it's not a
8 singular voter fraud in one state.

9 This pattern repeats itself in a number of
10 states, almost exactly the same pattern, which to any
11 experienced investigator, prosecutor, would suggest that
12 there was a plan, from a centralized place, to execute
13 these various acts of voter fraud, specifically focused on
14 big cities and specifically focused on, as you would
15 imagine, big cities controlled by democrats, and
16 particularly focused on big cities that have a long
17 history of corruption.

18 The number of voter fraud cases in Philadelphia
19 could fill a library. Just a few weeks ago there was a
20 conviction for voter fraud, and one two weeks before that,
21 and I've often said -- I guess sarcastically, but it's
22 true -- the only surprise I would have found in this is if
23 Philadelphia hadn't cheated in this election because for
24 the last 60 years, they've cheated in just about every
25 single election.

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1 You could say the same thing about Detroit.

2 Each one of these cities are cities that are
3 controlled by democrats, which means they can get away
4 with anything they want to do; it means they have a
5 certain degree of control over -- certainly control of the
6 Election Board completely, and they control law
7 enforcement, and unfortunately, they have some friendly
8 judges that will issue ridiculously irrational opinions,
9 just to come out in their favor.

10 So let's start with the specifics. Pennsylvania.

11 In Pennsylvania, the margin of victory now for
12 Biden, which is a -- not a victory, it's a fraud -- is
13 69,140 votes. The reality is that we are now at a count
14 of 682,770 ballots, for which we have affidavits that
15 there was no inspection of that ballot at the time that it
16 was entered in the vote. It was a mail ballot.

17 Mail ballots are particularly prone to fraud. We
18 were warned about that by Jimmy Carter, President Jimmy
19 Carter, and Secretary Baker in a report about a dozen
20 years ago, in which they said that mail balloting is
21 particularly susceptible of fraud, that we should very
22 carefully consider ever doing it, and that it can be taken
23 advantage of.

24 Justice Souter warned us of the same thing in a
25 comment in a election law case, and even the New York

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1 Times wrote articles about how dangerous mail voting --
2 mail-in voting was.

3 And this is the first time we ever did it
4 en masse, and I think we proved that all three are
5 prophets. It's not only susceptible to fraud, it is
6 easily susceptible to fraud, particularly if you have a
7 plan or scheme which sounds eerily similar to what Joe
8 Biden told us a few days before the election, that he had
9 the best voter fraud team in the world.

10 Well, they were good. I don't know that they
11 were that good because they made significant mistakes,
12 like all crooks do, and we caught 'em.

13 One of them was pushing out republican
14 inspectors. Every state, almost every civilized country,
15 even Tanzania and places that you wouldn't think of, have
16 rules about inspectors, particularly for mail-in ballots,
17 and why particularly for mail-in ballots? Because they
18 can more easily be defrauded and you can't check on them.

19 People who have never done a mail-in ballot, I'm
20 going to show you why it's so easy. Well, you fill out an
21 envelope like this, you put your -- usually -- in
22 New York, it would be your assembly district and the
23 precinct in which you're voting. You fill out your name
24 and your address and you sign it. You then use an inner
25 envelope and you put the ballot inside the inner envelope.

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1 You seal it all and you send it in.

2 When it's being counted, almost invariably in the
3 United States, up until the mass cheating that went on in
4 this election, a republican and a democrat inspector, as
5 well as others, if there are other parties, is allowed to
6 watch the unsealing of this ballot. It used to go on all
7 over America, when we conducted honest elections.

8 Because the only time you can ever find out if
9 it's a fraudulent ballot is when it is looked at. The
10 minute you approve this, it's thrown away, gone for
11 eternity. The only thing left is the vote.

12 That could have been Mickey Mouse, that could
13 have been a dead person, that could have been not filled
14 out properly, that could have been the same person 30
15 times, that could have been -- and all these things have
16 happened, by the way -- that could have been nothing
17 filled out. We'd never know.

18 So for example, the recount being done in Georgia
19 will tell us nothing because these fraudulent ballots will
20 just be counted again because they wouldn't supply the
21 signatures to page the ballots, so it means nothing to
22 have counted these ballots because, for example, in
23 Pennsylvania, where we have probably our most precise
24 evidence, 682,770 of these ballots were cast, put in and
25 they weren't inspected, which renders them ballots that

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1 are null and void. They cannot be counted.

2 Have to be removed from the vote.

3 Why? For several reasons, not the least of which
4 is that was basically only one of two places in the state
5 where it was done, so in the other parts of the state
6 there was a legitimate inspection of the ballots.

7 So if you have two different standards in
8 different parts of the state, one favoring one part of the
9 state, the other disfavoring the other part of the state,
10 that's a classic violation of the equal protection clause
11 in the United States Constitution, Bush v. Gore being the
12 most recent case that teaches that.

13 That's not the only fraud that went on in
14 Pennsylvania. All of the other frauds carried out in the
15 other states by the democrat bosses happened there as
16 well.

17 For example, if you made a mistake in that ballot
18 and you lived in Philadelphia or in Pittsburgh, you were
19 allowed to fix the mistake, but if you lived in the --
20 what would be considered more republican or Trump parts of
21 the state, you were given no such right.

22 One of our plaintiffs, Mr. Henry, cast a absentee
23 ballot and he failed to put it in the secure envelope
24 inside. He just put it in, open, naked. That ballot was
25 cast aside because it was invalid, because that breaks the

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1 privacy of the vote.

2 In Pittsburgh and in Philadelphia, if they
3 noticed that there wasn't an inner envelope, they'd
4 contact the voter and allow them to vote again, or if he
5 didn't fill it out completely or if he made a mistake and
6 didn't sign his full name, he was allowed to cure it.

7 There is no such provision under the law of
8 Pennsylvania. The democrat Secretary of State made that
9 up in order to maximize the votes in Philadelphia and
10 Pittsburgh and to minimize the votes in the other parts of
11 the state. Clearly illegal, clearly voter fraud, easily
12 provable, hundreds of witnesses, maybe thousands.

13 We have -- I'll give you another example.

14 We have 17,000 provisional ballots cast in
15 Pittsburgh. Do you know what a provisional ballot is? A
16 provisional ballot usually happens this way -- in about 15
17 of the 17,000 happened this way: You walk in and you say,
18 I'm here to vote today. Oh, Mr. Giuliani, you already
19 voted. I did? I don't remember voting. Oh, yes, yes,
20 you cast an absentee ballot. No, I didn't. Yes, you did.
21 No, I didn't. Yes, you did.

22 So why does that happen 17,000 times in
23 Pittsburgh? People walked in thinking -- actually 15,000,
24 to be precise -- why did it happen 15,000 times that
25 people in Pittsburgh walked in to vote and they had

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1 already voted, according to the democrat election machine?

2 Did they forget? That many people with bad
3 memories in Pittsburgh? Or is the following correct:

4 That as witnesses will testify, they were instructed by
5 the democrat bosses, when they had a ballot in which there
6 was no one registered, just assign it to somebody, just
7 assign it to Rudy Giuliani. So when Rudy Giuliani -- and
8 maybe Rudy Giuliani wouldn't show up to vote, and if he
9 does show up to vote, we'll give him a provisional ballot.
10 That is what we call circumstantial evidence of the fraud.

11 The direct evidence of the fraud are the people
12 who will testify that in fact that's what happened to
13 them, as well as the 50 to 60 witnesses we have for the
14 way they were treated and not allowed to inspect the
15 ballots. They weren't just not allowed to do it, they
16 were pushed, in a few cases they were assaulted, in all
17 cases they were put in a corral so far away -- probably
18 the closest they got is from here to the back of that
19 room.

20 We could do like a -- did you all watch My Cousin
21 Vinnie? You know the movie? It's one of my favorite law
22 movies. Of course he comes from Brooklyn and when the
23 nice lady who said she saw, and then he says to her, how
24 many fingers do I got up? And she says three. Well, she
25 was too far away to see it was only two.

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1 These people were further away than My Cousin
2 Vinnie was from the witness. They couldn't see a thing.

3 Now, I don't know, you're going to tell me that
4 60 people are lying? They didn't just tell me this, they
5 swore under penalty of perjury, which is something no
6 democrat's ever done.

7 You don't even ask Biden about this. You don't
8 put him under penalty of perjury. He doesn't even get
9 asked questions about it. He doesn't get asked questions
10 about all the evidence of the crimes that he committed.

11 These people are under penalty of perjury. Their
12 names are on an affidavit. They swear that they weren't
13 allowed to carry out their function as inspectors.

14 And it's not just a technical thing.

15 There's a reason they did it. Why would you not
16 allow people to carry out the function they've been
17 allowed to do for 50 years, 60 years, why wouldn't you
18 allow inspections of those ballots?

19 Because you knew you were going to use those
20 ballots to catch Biden up, and you had a big road ahead of
21 you. You had to catch him up for 700,000 to 800,000 votes
22 that he was behind, and the only way you were going to do
23 it were with the mail-in ballots. You couldn't have a
24 democrat and republican inspector around. They don't even
25 have democrats watching because they'd be afraid that

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1 they'd be honest democrats who would say you're cheating.

2 So that takes us to Michigan, where there was an
3 honest democrat who said they were cheating, and we'll
4 show you her affidavit because I know you keep reporting
5 falsely that we have no evidence, that we have no specific
6 acts of fraud. That's because the coverage of this has
7 been almost as dishonest as the scheme itself.

8 The American people are entitled to know this.
9 You don't have a right to keep it from them. You don't
10 have a right to lie about it, and you are. I mean, you
11 don't report to them that a citizen of this country, a
12 very fine woman who was willing to allow me to give you
13 her name -- I can't give you all these affidavits because
14 if I do, these people will be harassed, they'll be
15 threatened, they may lose their job, they will lose their
16 friends. We've lost lawyers in this case because they've
17 been threatened. We've had lawyers that need protection.

18 What's going on in this country is horrible, and
19 the censorship that you're imposing is making it worse.

20 But Jesse Jacob is an adult citizen and a
21 resident of the State of Michigan. She's been an employee
22 of the City of Detroit for decades. I know her age but...
23 she can tell you her age.

24 She was assigned to voting duties in September
25 and she was trained by the City of Detroit and the State

1 of Michigan. She was basically trained to cheat. She
2 said that, I was instructed by my supervisor to adjust the
3 mailing date of these absentee ballot packages to be dated
4 earlier than when they were actually sent in.

5 The supervisor made that announcement for all
6 workers, to engage in that fraudulent practice.

7 That's not me saying that, that's this American
8 citizen saying that, under oath. I don't know. Maybe you
9 could say she's lying, but you can't say there's no
10 evidence. This is what we call evidence.

11 This is direct evidence, not circumstantial.

12 I tried many, many cases, as did all my
13 colleagues here. You put a witness on the witness stand,
14 the witness is testifying to their own knowledge. This
15 witness goes on the witness stand and she will say, I was
16 told to adjust the dates on the absentee ballots. I
17 witnessed election workers and employees going over to the
18 voting booth with voters in order to watch them vote, and
19 coach them for whom to vote. Completely illegal.

20 She will testify to that.

21 I don't know, Biden's people can cross-examine
22 her, but you can't just throw it away -- gee, there's no
23 evidence. Next time you say that, you'll be lying because
24 there is evidence. By the way, this is public. You can
25 all get it. It's attached to the complaint in Costantino

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1 v. The City of Detroit.

2 Then she was instructed, by my supervisor not to
3 ask for a driver's license or any photo ID when a person
4 was trying to vote. Don't ask for identification.

5 Why would you not ask for identification?

6 Because you knew that a lot of people not
7 entitled to vote, were going to come in and early vote,
8 because you knew that illegal immigrants were going to be
9 allowed to vote. You knew, if you lived in
10 Philadelphia -- unless you're stunned -- that's an Italian
11 expression for stupid -- unless you're stupid, you knew
12 that a lot of people were coming over from Camden to vote.

13 They do every year. It happens all the time in
14 Philly. It's about as frequent as getting beaten up at a
15 Philadelphia Eagles' football game. It happens all the
16 time. All the time. And it's allowed to happen because
17 it is a democrat corrupt city, and has been for years.

18 Many, many years.

19 And they carried it out in places they could get
20 away with it. They didn't carry it out in neutral places,
21 they didn't carry it out in republican places, they didn't
22 carry it out where the law is respected, they carried it
23 out in a corrupt city where the district attorney releases
24 criminals en masse, which is why it has so much crime.

25 She also said, I observed a large number of

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1 people who came to the satellite location to vote in
2 person, but they had already applied for and submitted an
3 absentee ballot. So she observed a lot of people voting
4 twice. Again, this is Jesse Jacob, not me.

5 I was instructed not to invalidate any ballots
6 and not to look for any deficiency in the ballots.

7 Why would you do that? Because you're cheating,
8 on purpose cheating, intentionally cheating. You're
9 cheating as a institution.

10 This is an instruction from the Election
11 Commission or the -- to the worker: Don't look for any
12 deficiencies in the ballot. I was instructed not to look
13 at any of the signatures on the absentee ballots.

14 If she was instructed to look -- not to look for
15 any of the signatures on the absentee ballots, why the
16 heck do you sign it in the first place in order to
17 identify it? She was instructed not to do that because
18 many of the absentee ballots were fraudulent and they knew
19 that and they didn't want to have a count of that.

20 On November 4, 2020, I was instructed to
21 improperly predate the absentee ballots when the receipt
22 date was actually November -- was after November 3rd,
23 2020. Now, this is really significant because Justice
24 Alito of the Supreme Court instructed Pennsylvania that
25 any ballot that comes in after 8:00 o'clock on

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1 November 3rd, 2020, had to be put aside and not opened
2 because there's a question as to its legality and its
3 constitutionality.

4 What she's telling you is that they blatantly
5 disregarded that order. That they took ballots that were
6 marked the 4th and the 5th and the 6th and they marked it
7 down for the 3rd, in blatant disregard of the order of the
8 United States Supreme Court.

9 This is -- I don't know if she's a democrat or a
10 republican. I assume, if she's working for the -- I
11 assume, if she's working for the City of Detroit, that
12 she's a democrat. I assume, but I may be wrong.

13 She's a citizen. I never met her, never coached
14 her, and I'd like you to note that it's signed under
15 penalties of perjury.

16 We have a hundred more of these. I can't show
17 'em to you because those people don't want to be harassed,
18 they don't want to have their lives torn apart by the
19 goons on the other side. We don't do that to them.
20 They've done that to a lot of our people. They've done it
21 for four years, and it's outrageous that it's tolerated,
22 and it's tolerated because you condone it in the press and
23 you don't cover it and you don't condemn it. And it
24 shouldn't happen to a republican or a democrat. A lawyer
25 shouldn't have to withdraw from a case because he's

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1 representing the president of the United States.

2 There are many more affidavits here. I'd like to
3 read 'em all to you but I don't have the time. You should
4 have had the time and energy to go look for them. That's
5 your job. Like it's my job to defend the president and to
6 represent the president, it's your job to read these
7 things and not falsely report that there's no evidence.

8 Do you know how many affidavits we have in the
9 Michigan case? 220 affidavits. They're not all public,
10 but eight of them are. Four affiants here -- those are
11 people who give affidavits -- report an incident that
12 under any other circumstances would have been on the front
13 page of all your newspapers, if it didn't involve the
14 hatred that you have, the irrational, pathological hatred
15 that you have for the president.

16 What they swear to is that at 4:30 in the morning
17 a truck pulled up to the Detroit center where they were
18 counting ballots. The people thought it was food, so they
19 all ran to the truck. It wasn't food, it was thousands
20 and thousands of ballots, and the ballots were in garbage
21 cans, they were in paper bags, they were in cardboard
22 boxes and they were taken into the center.

23 They were put on a number of tables.

24 At that time they thought all the republican
25 inspectors had left, all but two had, and an employee of

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1 Dominion, who we will address a little bit later,
2 Dominion.

3 And here's what they jointly swear to: That
4 every ballot that they could see, everything they could
5 hear, these were ballots for Biden. When they saw a
6 ballot, these were ballots only for Biden, meaning there
7 was no down ticket, just Biden. Many of them didn't have
8 anything on the outer envelope because these ballots were
9 produced very quickly, very swiftly, and there are
10 estimated to be a minimum of 60,000, maximum of a hundred
11 thousand. Many of them were triple counted, which means
12 they were put into the counting machine this way; once,
13 twice, three times.

14 I didn't see that. I don't know that, but for
15 the fact that three American citizens are willing to swear
16 to it. And we're not going to let them go to court and do
17 that? We're going to let this election go by, when there
18 are -- in this case 60 witnesses that can prove what I'm
19 saying to you, and other acts of fraud in Michigan?

20 I mean, what's happened to this country, if we're
21 going to let that happen? What happened to this country,
22 if we're going to cover that up?

23 We let Al Gore carry on an election dispute
24 longer than this one has been going on for one state, and
25 for chads. This happened in Pennsylvania, it happened in

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1 Michigan. Michigan probably right now, if I count up the
2 affidavits, just one case alone, Trump v. Benson, a case
3 that we dismissed today because that case was attempting
4 to get the Wayne County Board of Supervisors to decertify.

5 Well, they did. They decertified.

6 That case has a hundred affidavits, and the
7 hundred affidavits show essentially what I have talked to
8 you about: Counting ballots improperly, counting them
9 three and four times; having people vote three and four
10 times, changing and backdating ballots, to the point of at
11 least 300,000 illegitimate ballots that we can
12 specifically identify.

13 The margin in Michigan was 146,121, and these
14 ballots were all cast basically in Detroit that Biden won
15 80/20. So you see it changes the result of the election
16 in Michigan, if you take out Wayne County.

17 So it's a very significant case. That is being
18 raised in the case of Costantino v. The City of Detroit.
19 Not by us, but by an individual plaintiff. We are helping
20 and assisting in that case, however, and you can find all
21 the affidavits that you want filed in that case, and you
22 can find out they're not just allegations, they're
23 allegations supported by sworn testimony, which is a lot
24 better than Joe Biden has ever done on anything. He
25 doesn't answer questions, much less give you sworn

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1 affidavits.

2 Wisconsin. Wisconsin had a very small margin.
3 20,544, last time I looked. In Wisconsin, without going
4 into great detail, very similar plan; republicans shut out
5 in the city of Milwaukee and also in Madison. Republicans
6 are almost uniformly shut out from the absentee process,
7 not allowed to inspect, not allowed to look at the
8 ballots.

9 We have, in Milwaukee and in the state of
10 Wisconsin, a much stricter law. Wisconsin doesn't allow
11 mail-in ballots. They didn't buy into the big mail-in
12 ballot situation.

13 Wisconsin, when you look at their Constitution,
14 almost seems to not like absentee ballots. They state
15 it's not a right, a privilege. And they have very, very
16 strict procedures. And their strict procedure says that
17 you can't be given an absentee ballot, you have to
18 personally apply for it. It's illegal, basically, to
19 solicit a vote.

20 And they have actually many reasons for it that
21 probably goes back to their progressive days -- when I say
22 "progressive," I mean late 19 century, early 20th century
23 progressive, when that really meant progressive, not
24 retrogressive.

25 So there are 60,000 ballots in Milwaukee County

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1 and 40,000 ballots in Madison that, as far as we can tell
2 -- and this is why we are auditing, because we have very
3 good information that the numbers are going to come out
4 about here that don't have applications.

5 Under the law of the state of Wisconsin, already
6 decided, if there's no application for an absentee ballot,
7 the absentee ballot is thrown away.

8 This all happened in two places in Wisconsin. It
9 didn't happen in northern Wisconsin, it didn't happen in
10 republican Wisconsin, it didn't happen in neutral
11 Wisconsin where there are an equal number of republicans
12 and democrats, it happened in the place where the vote was
13 75, 80 percent for the democrat.

14 You take away any number of those and that 20,000
15 lead disappears. In other words, if you count the lawful
16 votes, Trump won Wisconsin by a good margin.

17 Indeed, if you count the lawful votes in
18 Pennsylvania, he won it by about 300,000 votes.

19 Also in the lawsuit filed in Wisconsin, which is
20 really a petition because of their procedures, there were
21 no inspectors provided for the count of the illegal
22 ballots, there were numerous backdated ballots -- we're
23 just counting them now -- run over into the thousands, and
24 there were many precincts in which there was an overvote.

25 Now, let me explain to you what an overvote is,

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1 which is something you should have explained to the
2 American people, because it's about the clearest
3 circumstantial evidence of massive fraud that you can
4 have.

5 An overvote is if 200 percent of the people who
6 are registered in a district vote. Think about that.
7 200 percent of the registered voters in a district vote.

8 What does that mean? That means somebody voted
9 twice. That means somebody who is not entitled to vote,
10 voted; an illegal, a person from another city or state, a
11 person who is not registered, but what it means is that
12 those are illegitimate votes.

13 You don't have an overvote of 200 percent or
14 300 percent. You don't have an overvote of a hundred
15 percent. Most precincts don't have a hundred percent
16 turnout. In fact, classically it's considered to be an
17 overvote if you go over 80 percent. Well, in Michigan and
18 Wisconsin, we have overvotes in numerous precincts of
19 150 percent, 200 percent, and 300 percent.

20 One of the reasons why the two republicans did
21 not certify in Wayne, Michigan -- Wayne County, Michigan,
22 is because the overvote was so high, monstrously high in
23 about two-thirds of the precincts in the City of Detroit,
24 which means magically two and three times the number of
25 registered voters turned out to vote.

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1 In fact, we have precincts in which two times the
2 number of people who live there, including children,
3 voted. That's absurd.

4 The frustration of this is what I'm describing to
5 you is a massive fraud. It isn't a little teeny one.

6 It isn't a hundred votes switched here or there.

7 Georgia, we're about to file a major lawsuit in
8 Georgia. That will be filed probably tomorrow. I don't
9 need to go through it. Virtually the same things I've
10 told you before.

11 Very -- in the city of Atlanta, republicans were
12 not allowed to watch the absentee mail-in ballot process.
13 Inspections completely cast aside. And we have numerous
14 double voters, we have numerous out-of-state voters, and
15 we have specific evidence of intimidation and changes of
16 vote. That will all be in the lawsuit that comes out
17 tomorrow.

18 Arizona is a state that we're looking at very,
19 very carefully. I would say we're probably going to bring
20 a lawsuit in Arizona -- more than probably, I think we are
21 going to bring a lawsuit in Arizona. We're still
22 collecting that evidence.

23 And the state that we're looking at that would
24 surprise you is we have very, very significant amount of
25 fraud allegations in the State of New Mexico, which -- and

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1 we have a significant number of allegations in the state
2 of Virginia. I don't know yet whether the number in
3 Virginia will reach the number that can turn the election.

4 In the states that we have indicated in red:
5 Georgia, Pennsylvania, Michigan, Wisconsin, Nevada and
6 Arizona, we more than double the number of votes needed to
7 overturn the election, in terms of provable, illegal
8 ballots. All you got to do to find out if I'm misleading
9 you at all is to look at the lawsuits. Look at what's
10 alleged, look at the affidavits. Maybe we can supply more
11 affidavits. In order to do it, I have to get permission
12 from the people, but in the materials I have here, there
13 are at least ten that come from citizens. We have a
14 thousand at least, and we're getting more every day.

15 And there are other aspects of this fraud that at
16 this point, I really can't reveal. This is really enough.

17 It's enough to overturn any election.

18 It's disgraceful what happened.

19 And I'll conclude by asking you to just think
20 about this for a minute: What happened on the morning of
21 November 3rd, when they were going to count this new kind
22 of ballot, this mail-in ballot?

23 Did every democrat leader in Pennsylvania and in
24 Michigan and in Wisconsin and in Georgia and in Nevada and
25 in Arizona, did they all wake up and all separately have

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1 the same idea?

2 Did they all separately have the idea that we are
3 going to -- we're going to put republican inspectors in
4 pens, we're not going to let them look at mail-in or
5 absentee ballots? Did they all independently come up with
6 that, like just by coincidence? They said, hey, you know,
7 we're going to put -- we're going to put the republicans
8 in pens and corrals. We're going to do it in Pittsburgh and
9 we're going to do it in Philadelphia, we're going to do it
10 in Detroit, we're going to do it in Milwaukee, we're going
11 to do it in Las Vegas, we're going to do it in Phoenix --
12 what did I miss? Oh, we're going to do it in Atlanta.

13 Or isn't the logical conclusion that I think any
14 jury would accept, after they heard this evidence, that
15 somebody had this plan, maybe that was always the plan, to
16 do these -- this very, very questionable form of voting
17 which has been criticized by President Carter, by
18 Secretary Baker, by most experts on election reform.

19 I think the logical conclusion is this is a
20 common plan, a common scheme, it comes right directly from
21 the democrat party, and it comes from the candidate.

22 Clearly.

23 That's the reason why Hillary Clinton said, don't
24 concede, even if you're losing. That's the reason.

25 We had a Freudian slip by the candidate when he

1 said he had the best voter fraud team in the country.

2 That's the reason why he probably didn't have to
3 go out and campaign. He had to have known what they were
4 going to do. This had to be planned in advance.

5 I'm kind of checking, did they go, you know, to
6 the same contractor to get the corrals to put the
7 republicans in?

8 And this is a disgraceful thing that was done in
9 this country. Probably not much more disgraceful than the
10 things these people did in office, which you didn't and
11 don't bother to cover and you conceal from the American
12 people.

13 But we let this happen -- you know, we used
14 largely a Venezuelan voting machine, in essence, to count
15 our vote -- we let this happen, we're going to become
16 Venezuela. We cannot let this happen to us. We cannot
17 allow these crooks -- because that's what they are -- to
18 steal an election from the American people.

19 They elected Donald Trump. They didn't elect Joe
20 Biden. Joe Biden is in the lead because of the fraudulent
21 ballots, the illegal ballots that were produced and that
22 were allowed to be used after the election was over.

23 Give us an opportunity to prove it in court, and
24 we will.

25 Now I'm going to ask Sidney Powell to describe to

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1 you what we can describe about another totally outrageous
2 situation. I don't think most Americans know that our
3 ballots get calculated, many of them, outside the
4 United States and are completely open to hacking,
5 completely open to change, and it's being done by a
6 company that specializes in voter fraud.

7 I'll let Sidney describe that to you.

8 SIDNEY POWELL: Thank you, Rudy.

9 What we are really dealing with here and
10 uncovering more by the day is the massive influence of
11 Communist money through Venezuela, Cuba and likely China,
12 in the interference with our elections here in the
13 United States.

14 The Dominion Voting Systems, the Smartmatic
15 technology software and the software that goes in other
16 computerized voting systems here as well, not just
17 Dominion, were created in Venezuela at the direction of
18 Hugo Chavez, to make sure he never lost an election after
19 one constitutional referendum came out the way he did not
20 want it to come out.

21 We have one very strong witness who has explained
22 how it all works. His affidavit is attached to the
23 pleadings of Lin Wood, in the lawsuit he filed in Georgia.

24 It is a stunning, detailed affidavit because he
25 was with Hugo Chavez while the -- he was being briefed on

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1 how it worked. He was with Hugo Chavez when he saw it
2 operate, to make sure the election came out his way. That
3 was the express purpose for creating this software.

4 He has seen it operate, and as soon as he saw the
5 multiple states shut down the voting on the night of the
6 election, he knew the same thing was happening here, that
7 that was what had gone on.

8 Now, the software itself was created with so many
9 variables and so many backdoors that can be hooked up to
10 the internet or a thumb drive stuck in it or whatever, but
11 one of its most characteristic features is its ability to
12 flip votes. It can set and run an algorithm that probably
13 ran all over the country, to take a certain percentage of
14 votes from President Trump and flip them to president
15 Biden, which we might never have uncovered had the votes
16 for President Trump not been so overwhelming in so many of
17 these states that it broke the algorithm that had been
18 plugged into the system, and that's what caused them to
19 have to shut down in the states they shut down in.

20 That's when they came in the backdoor with all
21 the mail-in -- mail-in ballots, many of which they had
22 actually fabricated. Some were on pristine paper with
23 identically matching, perfect circled dots for Mr. Biden;
24 others were shoved in in batches -- they're always put in
25 in a certain number of batches, and people would rerun the

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1 same batch.

2 This corresponds to our statistical evidence that
3 shows incredible spikes in the vote counts at particular
4 times, and that corresponds to eyewitness testimony of
5 numerous people who have come forward and said they saw
6 the ballots come in the backdoor at that time.

7 Notably, the Dominion executives are nowhere to
8 be found now. They are moving their offices overnight to
9 different places. Their office in Toronto was shared with
10 one of the Soros entities, one of the leaders of the
11 Dominion project in -- overall is Lord Malloch-Brown,
12 Mr. Soros' number two person in the UK, and part of his
13 organization.

14 There are ties of the Dominion leadership to the
15 Clinton Foundation and to other known politicians in this
16 country.

17 Just to give you a brief description of how this
18 worked, I'm going to quote from a letter that was written,
19 and I will read that to make sure I get the quotes right.

20 This person was objecting to the United States'
21 acquisition of Sequoia Voting Systems by Smartmatic, a
22 foreign owned company.

23 I believe this transaction raises exactly the
24 sort of foreign ownership issues that CFIUS is best
25 positioned to examine for national security purposes.

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1 It's undisputed that Smartmatic is foreign owned
2 and it has acquired Sequoia -- they keep changing the
3 names as they go along. Different times when a problem
4 comes up, they just create another corporation and call it
5 a different name, but it was a voting machine company
6 doing business in the United States.

7 Sequoia voting machines were used to record over
8 125 million votes during the 2004 presidential election in
9 the United States.

10 Smartmatic now acknowledges that Antonio Mugica,
11 a Venezuelan businessman, has controlling interest in
12 Smartmatic, but the company has not revealed who all the
13 Smartmatic owners are.

14 According to the press, Smartmatic's owners are
15 hidden through a web of offshore private entities, and
16 that is in fact true.

17 Smartmatic has been associated with the
18 Venezuelan government led by Hugo Chavez, which is openly
19 hostile to the United States, and of course as we all
20 know, communistic and really brutalizing its own people.

21 The system has been continued there by
22 Mr. Maduro, and ensured his election.

23 Smartmatic's possible connection to the
24 Venezuelan government poses a potential national security
25 concern in the context of its acquisition of Sequoia,

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1 because electronic voting machines are susceptible to
2 tampering, and insiders are in the best position to engage
3 in such tampering.

4 This letter expresses concern of the Chicago 2006
5 primary election, and it ends by saying the products and
6 services that are of Venezuelan origin and evaluate
7 Smartmatic's ownership to determine who could have
8 influence and control over these and other Sequoia
9 products and services are important to the national
10 security of the United States.

11 This letter was written to Hank Paulson on
12 October 6th, 2006, by Congresswoman Carolyn B. Maloney.

13 Senators Klobuchar and Warren have raised these
14 concerns as recently as December 2019.

15 Why our government has not taken them seriously
16 is beyond my comprehension, unless they have some of the
17 three letter agencies have used them themselves in other
18 parts of the world. We know that the technology was
19 exported to affect an election in Argentina. That's
20 admitted by our friend who wrote the affidavit about Hugo
21 Chavez and his interest in Smartmatic.

22 Again, in 2006 Carolyn Maloney wrote the
23 Honorable John Snow, the Secretary of the Treasury, about
24 the issues.

25 Speaking of Smartmatic's leadership, one of the

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1 Smartmatic patent holders, Eric Coomer, I believe his name
2 is, is on the Web as being recorded in a conversation with
3 Antifa members, saying that he had the election rigged for
4 Mr. Biden, nothing to worry about here, and he was going
5 to -- they were going to "F" Trump. His social media is
6 filled with hatred for the president and for the
7 United States of America as a whole, as are the social
8 media accounts of many other Smartmatic people.

9 There has been widespread use of this. Dominion
10 itself is utilized in 2000 jurisdictions in 30 states. It
11 has been uncertifiable in multiple states, who realized
12 all the problems that it had, including Texas.

13 Experts have described it across the board, from
14 a Princeton group of three professors, to experts that we
15 have talked to, about its enduser vulnerabilities.

16 People can admittedly go in and change whatever
17 they want. They can set the ratio of votes from one thing
18 to another, they can say that a Biden vote counts as 1.25
19 and a Trump vote counts as .75, and those may be the
20 numbers that were actually used here.

21 It's not just the swing states that were
22 affected. The algorithm was likely run across the
23 country, to affect the entire election.

24 Like I said, we only discovered it this year
25 because of the overwhelming number of votes for President

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1 Trump in the swing states to cause the machines to have to
2 shut down for them to backfill or adding votes.

3 We have evidence of different numbers of votes
4 being injected into the system, the same identical unique
5 six digit number multiple times in at least two states
6 that we've analyzed so far, and I'm talking about 341,542
7 votes for Biden and 100,012 for Trump. There's no
8 explanation, no logical explanation for the same numbers
9 being injected 20 minutes apart into the machine.

10 The software manual itself, you can download it
11 from the internet, and I would encourage you all to read
12 it because it specifically advertises some of these things
13 as features of the system. Why it was ever allowed into
14 this country is beyond my comprehension and why nobody has
15 dealt with it is absolutely appalling.

16 The machines were easily accessible to hackers,
17 there's video on the net that will explain to you how a
18 kid with a cell phone can hack one of these voting
19 machines.

20 There's been no oversight of Dominion or its
21 software. Workers in each county were trained by
22 Dominion, but there's no evidence of any monitoring
23 otherwise. We have testimony of different workers
24 admitting that they were trained how to dispose of Trump
25 votes and add to Biden votes.

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1 The software has a feature pursuant to which you
2 can drag and drop any number of batches of votes to the
3 candidate of your choice, or simply throw them away.

4 So we have mathematical evidence in a number of
5 states of massive quantities of Trump votes being trashed,
6 just simply put in the trash like you would on your
7 computer with any file, and Biden votes being injected.

8 That's in addition to the flipping. I mean, it
9 really happens in two ways. There's an algorithm that
10 runs that automatically flips all the votes and then each
11 operator has the ability to go in, override settings, they
12 can ignore signature, they can ignore the top line of the
13 ballot, they can go down ballot and select who they want
14 to change the results for.

15 Mr. -- the gentleman who founded Smartmatic,
16 there's video of him on the internet explaining that, yes,
17 in at least one occasion he admits, they changed a million
18 votes with no problem.

19 Many of the jurisdictions that have had this
20 problem might not have known of the issues, but many did,
21 and I think a full scale criminal investigation needs to
22 be undertaken immediately by the Department of Justice and
23 by every state's equivalent, Attorney General's Office or
24 state investigatory unit, because there's evidence of
25 different benefits being provided to the people who spent

1 a hundred million dollars of taxpayer money at the last
2 minute for their state to get the Dominion Voting Systems
3 put in in time for this election, in different ways.

4 There's one person that a lawyer told me got,
5 quote, election insurance, meaning that he would be able
6 to make sure he was elected. I'm sure they explained that
7 feature in detail to many people who expressed interest in
8 putting this voting system in.

9 Texas denied certification of the Dominion system
10 in 2019 but there are no doubt issues with the software
11 that Texas did use -- unbeknownst to Texas, I would
12 imagine, since they went to great trouble to examine the
13 Dominion Systems and reject them; but other software, the
14 source code that does the alterations is embedded, we have
15 been told, in the source code all across the country, in
16 all the voting machines.

17 There's no doubt it has been used to alter
18 elections in other countries. We know specifically that
19 Venezuela exported it for that purpose to Argentina and
20 other Latin-American companies to make sure that the
21 corrupt rulers who were willing to pay the highest price
22 for being in office were allowed to rig their elections.

23 This is stunning, heartbreaking, infuriating, and
24 the most unpatriotic acts I can even imagine for people in
25 this country to have participated in in any way, shape or

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1 form, and I want the American public to know right now
2 that we will not be intimidated. American patriots are
3 fed up with the corruption from the local level to the
4 highest level of our government and we are going to take
5 this country back, we are not going to be intimidated, we
6 are not going to back down, we are going to clean this
7 mess up now.

8 President Trump won by a landslide. We are going
9 to prove it and we are going to reclaim the United States
10 of America for the people who vote for freedom.

11 PRESS: How come you're not suing in the
12 Wisconsin counties that used this?

13 Why are you only doing a recount --

14 JENNA ELLIS: Excuse me, we're not up to the
15 questions at this point. So excuse me, we're not at the
16 questions at this point.

17 My name is Jenna Ellis and I'm the senior legal
18 advisor to the Trump campaign and I'd like to just explain
19 now where we've been and where we're at and what you can
20 expect from this process.

21 So what you have heard, I'm sure, in the fake
22 newspapers tomorrow will be one of two things: Either
23 there was not sufficient evidence that we've presented or
24 we spoke too long. Okay?

25 So what you've heard now is basically an opening

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1 statement. This is what you can expect to see when we get
2 to court to actually have a full trial on the merits, to
3 actually show this evidence in court and prove our case.

4 This is not a Law and Order episode where
5 everything is neatly wrapped up in 60 minutes.

6 For those of you who are here in this room or
7 have maybe tuned out in other networks, clearly you've
8 never been court reporters. Trials take time. Putting on
9 evidence takes time. This is basically an opening
10 statement so the American people can understand what the
11 networks have been hiding and what they refuse to cover
12 because all of your fake news headlines are dancing around
13 the merits of this case and are trying to delegitimize
14 what we are doing here.

15 Let me be very clear that our objective is to
16 make sure to preserve and protect election integrity.

17 President Trump has been saying from day one that
18 this is about maintaining free and fair elections in this
19 country. It is not about overturning an outcome, it is
20 about making sure that election integrity is preserved,
21 and every American should want that.

22 If every American is not on board with that, you
23 have to ask yourself why, and if your fake news network is
24 not covering this or allowing you to cover it fairly and
25 accurately, you should ask yourself why.

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1 This is absolutely a legitimate legal basis. We
2 have been asked to provide an entire case that generally
3 would take years in civil litigation.

4 I've been a prosecutor, I have tried cases with
5 far simpler facts, one thing happened in a matter of
6 minutes, and it still takes days, and we go through a jury
7 process.

8 This is the court of public opinion right now.
9 We are not trying our case in the court of public opinion
10 because if we were, we would get unbiased jurors. I would
11 strike 99 percent of you from the jury, and I would be
12 allowed to because of the fake news coverage you provide.

13 You are not unbiased jurors, and until you step
14 out of your role as a journalist and actually go into a
15 courtroom and you are a judge on a bench that has sworn an
16 oath to be unbiased in our separation of powers, then your
17 opinion does not matter.

18 The facts matter, the truth matters, and if you
19 are fair reporters, you will cover that fairly and
20 appropriately and you will allow coverage of our media
21 team here and our legal team.

22 That is absolutely shocking, that all you cover
23 are around the margins. And I've seen all of you taking
24 pictures right now and I can anticipate what your
25 headlines are going to be.

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1 If you are not willing to talk about the evidence
2 that has been presented, then that is absolutely
3 unacceptable for journalistic standards.

4 This is an opening statement.

5 This is something where we have told you what the
6 evidence will show, and we have given you a brief
7 description. That happens in a courtroom all the time,
8 where that's not the fact finding process, that is just an
9 overview. That is what we have given you today, because
10 the American people need deserve to know what we have
11 uncovered in the last couple of weeks.

12 Remember, this is such a short time frame and
13 this is an elite strike force team that is working on
14 behalf of the president and the campaign to make sure that
15 our Constitution is protected.

16 We are a nation of rules, not a nation of rulers.
17 There is not someone that just gets to pick who the next
18 president is, outside the will of the American people.

19 And that is our task, because when we talk about
20 voter fraud, it's actually election official fraud. That
21 cannot stand. The Constitution requires that the state
22 legislatures are the ones that make election law. It
23 still has to go by the U.S. Constitution.

24 But what has happened in this case is that state
25 and local level officials, and all the way up, have

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1 changed the rules. That's what the democrats do. If they
2 don't like the rules, they change them, and they change
3 them at the last minute, they manipulate them, they want
4 to tear down our American system.

5 Our founders were so brilliant that they
6 anticipated this, that there would be corruption, there
7 would be foreign influence, there would be attempts to
8 manipulate the outcome of the election, especially with
9 who they called our chief magistrate.

10 I would encourage all of you to go home and
11 actually read Alexander Hamilton's Federalist 68 and see
12 what he described as an advocacy position to adopt and
13 ratify the Electoral College, and the process by which we
14 select our president.

15 We select our president through the Electoral
16 College, not because it disenfranchises voters, but
17 because it is a security mechanism for exactly the type of
18 corruption that we are uncovering, and every American
19 should be grateful and thankful that our founders had the
20 foresight to put in those protections and provisions to
21 make sure that your legitimate legal vote is not
22 disenfranchised.

23 That is what we are advocating for. We want to
24 make sure to protect election integrity and your
25 president, President Trump, we are so proud that he is in

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1 this fight because he understands that when he swore his
2 oath of office, he swore an oath to uphold and defend the
3 United States Constitution. That is what he is doing.

4 And that is what we are doing. We are confident
5 that through this multiple pathway to victory, we will get
6 to the actual outcome that the evidence shows.

7 But this is not about overturning an election on
8 our part, it's about making sure that we protect and
9 preserve free and fair elections for all future American
10 elections.

11 If the United States caves to corruption or this
12 type of election integrity disaster, then no election will
13 be secure from here on out, and we all need to be keenly
14 aware of that.

15 We are the representatives here that are standing
16 in this gap and defending President Trump and defending
17 you, the American people, at the end of the day.

18 This is ultimately about the United States of
19 America, and we want to make sure to protect and defend
20 that.

21 And as my colleagues have said, we will not back
22 down, we won't be intimidated, President Trump will not be
23 intimidated, you the American people should not be
24 intimidated. You the press should cover this fairly and
25 should know that this matters to election integrity and it

1 matters to the future of our nation.

2 So we have given you an overview, but recognize
3 this is not a court of law. We will get there and we have
4 time and we have constitutional provisions that will step
5 in when we show the corruption and the irredeemably
6 challenged and overturned votes that are absolutely
7 corrupt in all of these counties. It is irredeemably
8 compromised. We will show that, but you have to give us
9 that opportunity. This has been just our opening
10 statement and we have an opportunity to get there and we
11 have time and we will do that.

12 This is the United States of America and we stand
13 proudly for President Donald J. Trump. Thank you.

14 SIDNEY POWELL: The world is watching this.

15 I have gotten multiple emails from people in
16 other countries who watched the same pattern happen there.

17 We have witness testimony that these same things
18 were done in those countries, as this was exported from
19 Venezuela and by Maduro and by Mr. Chavez and by Cuba, and
20 of course we know China also has a substantial presence in
21 Venezuela and substantial interests in making sure that
22 President Trump does not continue in office.

23 This is the consummate foreign interference in
24 our election, in the most criminal way you can possibly
25 imagine. It must be shut down.

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1 We know, for example, that one of the Dominion's
2 highest level employees or officers went to Detroit
3 himself to man the Detroit operations center, where he
4 could watch the votes coming in realtime and decide what
5 file folder in the system to put those votes into.

6 That's why you see massive spikes after hours,
7 when people were told that all the votes were in and all
8 the votes were counted.

9 Many Dominion employees have already reached out
10 to us to tell us the truth. They are Americans who want
11 to ensure election integrity like we do.

12 I would encourage every Dominion or Smartmatic
13 employee who is fed up with the corruption in this
14 country, to come forward as soon as possible because these
15 are serious federal offenses that I am confident the
16 Department of Justice will be in pursuit of in very short
17 order, if they are not already.

18 RUDY GIULIANI: All right, a few questions.

19 PRESS: Yeah, Mayor Giuliani, this sort of
20 reminds me of 30 years ago, they had federal judges doing
21 consent decrees over elections, you get a federal judge
22 overseeing the election -- this is in the old Chicago
23 days. Will you be asking that in Georgia, where you have
24 two Senate races that have the U.S. District Court judges
25 and federal authorities monitoring the elections?

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1 RUDY GIULIANI: I can't say what's going to be
2 done about --

3 PRESS: Can we have sort of a operation --

4 RUDY GIULIANI: I'm sorry, in what county?

5 PRESS: In (unintelligible) county, Pennsylvania,
6 to (unintelligible) there's an Operation Greylord, I don't
7 know if you were aware of that.

8 RUDY GIULIANI: Yep, I know about it. I really
9 can't give you an opinion on that. I think obviously
10 every election official should learn something from this
11 and be very, very careful with the next election.

12 I know this is a lot of information that we've
13 given you, probably because we're frustrated with what we
14 keep reading and hearing in the censored press, which is
15 that we have no evidence, we have no specifics, we have no
16 backup for what we're saying, and you largely ignore the
17 affidavits that are filed. Whether you agree or disagree
18 with an affidavit, it's evidence.

19 You can't say -- I mean, you're just lying to the
20 American people when you say there's no evidence.

21 Sidney was giving you information that come from
22 affidavits from other people, that are given under oath.

23 I was explaining things to you from affidavits
24 that come from other people, American citizens, who swear
25 under oath that they saw 100,000 ballots come in and that

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1 they were all for Joe Biden; and that I should point out,
2 now that Sidney has spoken, that those happened just
3 around the time that the Dominion or Smartmatic people
4 called a halt to the election, and then you can also trace
5 it with a very big spike in the vote count at exactly that
6 time. Right up.

7 So what we're telling you is supported by
8 evidence and we're going to have to present these because
9 of the procedures that exist, according to the different
10 voting laws of the different states.

11 For example, you asked us about Wisconsin. We
12 have to first create a contest in Wisconsin before we can
13 move to bringing a fulsome federal lawsuit.

14 The contest, from everything I can see, is going
15 to overturn the vote because it's going to show somewhere
16 around a hundred thousand illegal ballots in two counties
17 that Biden carried by 75, 80 percent -- and you know how
18 close Wisconsin is -- and what I'm talking about is the
19 absentee ballots for which there were no applications, and
20 that's not just a small matter.

21 The reason for the application and the reason to
22 keep all these things together is precisely to avoid what
23 the democrats did in this election, which is to misuse the
24 absentee ballot process and the mail-in ballot process, in
25 order to cheat.

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1 So they really cheated in two respects.

2 They cheated with the machines. Instead of
3 asking me are we going to bring a lawsuit in Wisconsin --
4 which we will, if we have to -- you should have asked me
5 -- and you should be more astounded by the fact that our
6 votes are counted in Germany and in Spain by a company
7 owned by affiliates of Chavez and Maduro.

8 Did you ever believe that was true? Did any of
9 you here believe that that was possible? Of course it's
10 not -- of course it shouldn't be possible. I don't know
11 if we're going to have time to develop all that in time to
12 fill the requirements of all these cases.

13 We have enough evidence without that to overturn
14 this election. We have it from the affidavits of American
15 citizens. But that's a matter of national security that
16 we're talking about now. Very, very serious matter of
17 national security. Please don't make light of it and
18 don't act like you knew it. Don't act like it isn't a
19 surprise. If that's not a headline tomorrow, then you
20 don't know what a headline is.

21 There isn't a single person in this country that
22 would have believed that we have states that are stupid
23 enough to have our vote sent out of this country.

24 You couldn't possibly believe that the company
25 counting our vote, with control over our vote, is owned by

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1 two Venezuelans who were allies of Chavez, are present
2 allies of Maduro, with a company whose chairman is a close
3 associate and business partner of George Soros, the
4 biggest donor to the democrat party, the biggest donor to
5 Antifa and the biggest donor to Black Lives Matter.

6 My goodness, what do we have to do to get you to
7 give our people the truth? Yes.

8 PRESS: Thank you, Mayor Giuliani. My name is
9 (unintelligible). Some on this legal team have mentioned
10 before that people close to the Trump campaign are
11 pressuring him to drop the investigation into Dominion.

12 Can you go further into detail and tell us
13 specifically who those people are?

14 Also, if it's possible, can you tell us if they
15 work with some of our powerful defense groups in the
16 United States, such as the CIA?

17 RUDY GIULIANI: The last part was do they work?

18 PRESS: With defense groups.

19 RUDY GIULIANI: With defense groups and the CIA.

20 First, I'm in charge of this investigation, with
21 Sidney and the people that you see here. There's been no
22 pressure to stop investigating Dominion.

23 PRESS: No, to stop --

24 RUDY GIULIANI: No, there's pressure to go as
25 fast as we can. I think there was uniform shock, when we

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1 first heard it. I think when I first heard it, I didn't
2 believe it, until Sidney showed me the documents.

3 And in fact I feel kind of stupid, and you all
4 should, because all you had to do was go online and find
5 out that Smartmatic is owned by Venezuelans close to
6 Chavez. You can Google it. Well, unless they take it
7 down. I preserved it, so you can find it.

8 By the way, the Coomer character who is close to
9 Antifa took off all of his social media. Ha-ha. But we
10 kept it, we've got it. The man is a vicious, vicious man.
11 He wrote horrible things about the president. He is
12 completely -- he is completely biased, he's completely
13 warped, and he specifically says that they're going to fix
14 this election.

15 I don't know what you need to wake you up to do
16 your job and inform the American people, whether you like
17 it or not, of the things they need to know.

18 This is real. It is not made up. There's nobody
19 here that engages in fantasies. I've tried a hundred
20 cases. I've prosecuted some of the most dangerous
21 criminals in the world. I know crimes. I can smell 'em.

22 You don't have to smell this one. I can prove it
23 to you 18 different ways. I can prove to you that he won
24 Pennsylvania by 300,000 votes. I can prove to you that he
25 won Michigan by probably 50,000 votes.

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1 When I went to bed on election night, he was
2 ahead in all those states, every single one of those
3 states. How is it they all turned around, every single
4 one of them turned around?

5 Or is it more consistent there was a plan to turn
6 'em around? And since there are witnesses who say there
7 was a plan to turn 'em around and it kind of begs
8 credulity to say that it all happened, in every single
9 state, my goodness, this is how you win cases in a
10 courtroom.

11 PRESS: Sir, is it your goal with this to
12 (unintelligible) officials and law makers in battleground
13 states to block or delay certification so the GOP can pick
14 their own electors; is that the endgame here?

15 RUDY GIULIANI: Our goal here is to go around the
16 iron curtain of censorship that -- what publication are
17 you with?

18 PRESS: CNN.

19 RUDY GIULIANI: It's to go around the outrageous
20 iron curtain of censorship and get facts to the American
21 people that, if you were a fair and honest network, you'd
22 have been reporting for the last two weeks. These are
23 facts. These are things that actually happened. These
24 people really wrote these affidavits. These affidavits
25 are really part of the public record. You're concealing

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1 them, you're covering them up. And our role here is to do
2 your job, because you don't do it.

3 Chanel.

4 PRESS: Mr. Mayor, thank you. Where is our FBI,
5 and have they expressed any interest whatsoever in looking
6 into allegations of voter fraud and election fraud that
7 you have pointed out in these six states?

8 RUDY GIULIANI: Come on.

9 You have to have a little humor.

10 SIDNEY POWELL: We have witnesses who have
11 actually reported --

12 RUDY GIULIANI: Where are you, FBI?

13 SIDNEY POWELL: -- to the FBI, and nothing has
14 happened as a result of it.

15 RUDY GIULIANI: I don't know where the FBI has
16 been for the last three years. I have no idea where the
17 FBI has been for the last four years.

18 Explain to me how the FBI concealed a memo in the
19 hand of Brennan to Obama, saying that Hillary basically
20 made up the Russia collusion plot. They withheld that for
21 four years and cost our country \$40 million and two
22 impeachment -- one attempted, one actual, and then a
23 acquittal proceeding. I don't know where they've been. I
24 don't know where were on the hard drive. They got it
25 eight, 10 months ago. There are clear crimes revealed on

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1 it. They didn't do anything with that.

2 I don't know where they are now. Our country has
3 had its ballots counted, calculated and manipulated in a
4 foreign country, with a company controlled by friends of
5 an enemy of the United States.

6 What do we have to do to get the FBI to wake up?
7 Maybe we need a new agency to protect us. I have no idea.

8 SIDNEY POWELL: If I may speak for just a minute.

9 RUDY GIULIANI: Sure.

10 SIDNEY POWELL: In terms of the level of
11 corruption we are looking at here, we have no idea how
12 many republican or democratic candidates in any state
13 across the country paid to have the system rigged to work
14 for them. These people didn't do this just to take
15 control. They make one heck of a lot of money off of it.

16 Think about the global interests behind your own
17 news organizations. Think about the pressure being
18 brought to bear on -- from the social media companies to
19 shut down free speech on any challenge to the election.

20 This is a massive, well-funded, coordinated
21 effort to deprive we the people of the United States of
22 our most fundamental right under the Constitution, to
23 preserve this republic that we all cherish.

24 It is of the greatest concern.

25 It is the 1775 of our generation, and beyond.

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1 PRESS: Sidney, the votes being held and
2 processed, tabulated overseas, there are reports that
3 there was a piece of hardware, probably a server picked up
4 in Germany. Is that true and is it related to this?

5 SIDNEY POWELL: That is true. It is somehow
6 related to this, but I do not know whether good guys got
7 it or bad guys got it.

8 PRESS: So we don't know who has that?

9 PRESS: Sidney, I have a question on --

10 PRESS: -- Wisconsin or the counties that use
11 Dominion Systems?

12 SIDNEY POWELL: I can only hear one person at a
13 time. I'm going to take the ones with the hands raised.

14 PRESS: I'm with just the news (unintelligible)
15 so question for you, Sidney. First on the issue of the
16 machines, do you plan to have -- are you seeking a court
17 order to either seize or subpoena or just to gain access
18 to any of these machines in any of these contested
19 districts, have you begun that process and when can we
20 expect a timeline on that?

21 And then for you, Mr. Mayor, you mentioned in
22 Wisconsin and in Michigan these issues of overvoting.

23 Where can we learn more about that -- you're
24 saying 150, 200 percent?

25 SIDNEY POWELL: Up to 350 percent, in some

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1 places.

2 PRESS: Where would we get access to that data?

3 And then to what extent were those people who
4 showed up to vote in person? Because in Michigan, for
5 example, they did allow same day registration.

6 SIDNEY POWELL: Yes. Well, the same day
7 registration causes problems with the vote signature and
8 the registration itself. That's a whole different system
9 that makes it impossible, really, to validate the
10 signature. I mean, one person could sign the same name --
11 I mean, I could sign John Smith, I could sign Kay Smith, I
12 could sign on both things and run 50 ballots that way, and
13 we've got some evidence of that being done as well.

14 Rudy, do you want to speak to the other part of
15 it?

16 RUDY GIULIANI: Sure. We have now three overvote
17 analyses done; one for Pennsylvania, one for Michigan, and
18 one for Wisconsin. We're in the process -- oh, I'm sorry,
19 Georgia. We're in the process of doing the others.

20 I'll check to see if it's appropriate for us to
21 make it public. I imagine it is, but you could actually
22 do -- you could do it yourself.

23 SIDNEY POWELL: A lot of the analysis comes from
24 the realtime data that came through to the news medias the
25 night and following the election, and some entrepreneurs

1 out there have started crunching data themselves, in
2 addition to multiple experts who could easily recognize,
3 with the mathematical brain that I do not have, the beyond
4 explicable deviations, to the point of mathematical
5 impossibility, that 186,000 votes come in at once, all for
6 Joe Biden. That's like flipping a coin 186,000 times and
7 it lands on heads every time. That does not happen.

8 There is no reasonable explanation for the
9 up-shoots, the straight lines up -- I'm not even talking
10 about an angle, I'm talking about some massive straight
11 lines up in the vote tallies in the middle of the night,
12 after they've supposedly stopped counting, and that's when
13 the Dominion operators went in and injected votes and
14 changed the whole system; and it affects votes around the
15 country, around the world, and all kinds of massive
16 interests of globalists, dictators, corporations -- you
17 name it. Everybody's against us except President Trump
18 and we the people of the United States of America.

19 PRESS: You've spoken of unleashing the kraken.

20 Is the country ready for this? I mean, Americans
21 should be astonished what you're saying here today. Is
22 the country on the verge of an electoral breakdown?

23 SIDNEY POWELL: We've already had it.

24 We have already had that electoral breakdown.

25 But the Constitution, as Jenna explains, has

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1 provisions in it for how you fix this, and there should
2 never be another election conducted in this country -- I
3 don't care if it's for local dog catcher -- using a
4 Dominion machine and Smartmatic software.

5 We have got to have an American company that uses
6 paper ballots that we can all verify so every one of us
7 can see that our vote is our vote.

8 PRESS: Why are you not requesting recounts in a
9 Wisconsin county that used Dominion software? You're
10 requesting recounts in two counties that don't use the
11 software at all.

12 RUDY GIULIANI: Because this case is not only
13 about -- remember, this case didn't begin with Dominion.

14 This case began and this case can be proven the
15 old-fashioned way. It can be proven based on just good
16 old-fashioned democratic tactics that go back to Mayor
17 Daley in the 1960's when he held the vote back in Chicago
18 so that he could elect John F. Kennedy; or as recently as
19 last year, when they held the vote back in Palm Beach
20 County and Broward County in order to see if they could
21 steal that election for the Senate and governor, and then
22 got caught manufacturing ballots. Democrats have been
23 doing this for years, on a small scale.

24 When they passed the mail-in voter statute, which
25 all of a sudden multiplied by ten times the number of

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1 mail-in votes, they realized they could have a field day.
2 They could do precisely what Jimmy Carter and Secretary
3 Baker warned us about. All you have to do is own an
4 election board, and you can get away with it.

5 And unlike what Sidney is talking about, where
6 you can have a paper trail, a paper ballot, I tried to
7 point out to you, the minute that you separate the outer
8 envelope from the ballot, you can no longer trace it,
9 which is why the count -- whatever the count in Georgia
10 today is, it's totally ridiculous.

11 They're counting the same fraudulent ballots one
12 more time. And we're still very close.

13 PRESS: So far (inaudible) that's got to be
14 disappointing to you and the president. How would you
15 describe his mood at the moment and do you and him still
16 genuinely believe you can overturn this election or is it
17 about something bigger than you?

18 RUDY GIULIANI: Well, it is about something --
19 let's go from the big picture to the smaller picture.

20 The most important thing here is that this has
21 been a massive attack on the integrity of the voting
22 system in the greatest democracy on earth.

23 The people who did this have committed one of the
24 worst crimes that I've ever seen or observed.

25 One of the things we're the most proud of in this

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1 country is that we've been such a longstanding democracy,
2 based on the right to vote. They have trashed the right
3 to vote, they've dishonored the right to vote, they've
4 destroyed the right to vote, in their greed for power and
5 money. And there's no doubt about it. This was not an
6 individual idea of 10 or 12 democrat bosses.

7 This is a plan. You would have to be a fool not
8 to realize that. They do the same thing in exactly the
9 same way in ten big democrat controlled, in most cases,
10 crooked city -- and when I say "crooked city," go look at
11 how many of their officials have gone to jail in the last
12 20 or 30 or 40 or 50 or 60 years that they have dominated
13 and destroyed those cities.

14 They picked the places where they could get away
15 with it. They picked the places where, whether or not
16 republicans testify to something, judges would just
17 dismiss it, because judges are appointed politically and
18 too many of them are hacks.

19 They pick places where they can get a sheriff
20 that refused to enforce a court order. When we got a
21 court order that we could be ten feet closer, our
22 representatives were told: If you try to do it, I'll
23 arrest you.

24 PRESS: (Inaudible) national conspiracy
25 suggesting that Joe Biden was actually part of that.

1 RUDY GIULIANI: Part one. Part one.

2 It began as a national conspiracy, clearly. That
3 evidence emerged very, very quickly. The minute I saw
4 that it was the same thing in ten states, just using
5 logic, I said this can't be an accident.

6 And then what I was surprised about is the
7 dimension of it. I mean, not inspecting almost 700,000
8 ballots is astounding.

9 PRESS: Are you suggesting that Joe Biden was
10 part of that conspiracy?

11 I just wonder what your evidence is.

12 RUDY GIULIANI: Honestly, I don't know what Joe
13 Biden is aware of or not aware of, and I mean that as a
14 lawyer, not trying to be -- not trying to be cute. I've
15 watched him, I've observed him. I honestly don't know how
16 much he's aware of. I don't know how much he decides and
17 how much things are decided for him.

18 JENNA ELLIS: Can I say just one other thing to
19 your question about the process.

20 Your question is fundamentally flawed when you're
21 asking where is the evidence. You clearly don't
22 understand the legal process. What we have asked for in
23 the court is to not have the certification of false
24 results. And so to say, hold on a minute, we have
25 evidence that we will present to the court. We haven't

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1 had the opportunity yet to present that to the court.

2 We're giving you an overview and a preview of
3 what we've discovered, but no court yet has had -- we've
4 had that opportunity. So when we have a -- and we have
5 fraud allegations pending.

6 So what we've asked for are temporary restraining
7 orders or injunctions to not certify false results.

8 We're very happy that Michigan, the reason we
9 dismissed that lawsuit today is because the Michigan
10 county in Wayne County, they're not going to certify that
11 because 71 percent of counties have inconsistent data.

12 No person in this room or in this country should
13 want states to rush through and coronate a president with
14 false results. We have to make sure that the results are
15 accurate, and that's what we will prove.

16 RUDY GIULIANI: Two more questions.

17 PRESS: The Secretary of State says that that
18 can't actually happen, that those votes can't be rescinded
19 and that was a (unintelligible) representation in Michigan
20 currently stands.

21 RUDY GIULIANI: The Secretary of State where?

22 PRESS: In Michigan.

23 SIDNEY POWELL: Well, there are problems in
24 Michigan. Follow the money.

25 RUDY GIULIANI: Follow the political party,

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1 ma'am. I mean, you're actually seriously going to want me
2 to take seriously the Secretary of State of Michigan, when
3 Michigan -- when Michigan -- when the Secretary of State
4 of Michigan never bothered to find out that the votes in
5 her state were being counted in Germany by a Venezuelan
6 company, and you want me to take her seriously or him
7 seriously?

8 I mean, I was in government. If I were the
9 governor of that state I'd fire everybody that was
10 involved in this election. They didn't come and tell me
11 that my state was going to be embarrassed, made a fool of
12 because I'm sending my votes of people in Michigan over to
13 Germany to be counted by a company that is owned by people
14 who are allies of Maduro and Chavez?

15 By the way, Carolyn Maloney who wrote that is my
16 Congresswoman. A democrat pointed that out.

17 They didn't do the darnedest bit of due
18 diligence. If you bought a \$10 million company you would
19 have done more due diligence than that.

20 Maybe they're incompetent or maybe they didn't
21 want to know, but you're not going to have me take
22 seriously anything that comes from anyone involved in the
23 election, the way it was conducted in Michigan.

24 PRESS: You guys are saying that those votes have
25 been rescinded. They haven't. The Secretary of State

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1 there said that they can't be.

2 RUDY GIULIANI: The Secretary of State can say
3 whatever she wants to say. Of course she's going to say
4 that. She's a democrat. She could also credit the
5 affidavits of the two people and say that the board is
6 tied and therefore the vote hasn't been certified.

7 So because she's a democrat, she's saying that.

8 Do you think she has any credibility, having run
9 the kind of election they ran in Michigan? Do you think
10 anyone in that government has credibility, after using a
11 machine and fooling their citizens? There can't be a
12 person in Michigan who thought their vote was being sent
13 outside the United States so somebody could play with it.

14 I mean, it's disgraceful, what the government of
15 Michigan did to its citizens. Absolutely disgraceful.

16 PRESS: Mr. Mayor, you have alleged
17 (unintelligible) get your hands on the -- sorry, the
18 voting machines or the servers and are you going to have
19 to say what, when, where?

20 RUDY GIULIANI: We are limited in what we can do.
21 We're not the FBI, we're not the government. We don't
22 have that kind of subpoena power, we don't have the power
23 to just go subpoena anything we want. The government
24 does. We would have to subpoena in line with a case.

25 Our first case, we're asking for that authority

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1 in Pennsylvania and in Michigan. But you have to get that
2 authority from the court. We're private citizens, we're
3 not the government.

4 If I were the government like I used to be, there
5 would probably be a lot of people arrested by now because
6 there's plenty of probable cause.

7 Plenty of probable cause.

8 BORIS EPSHTEYN: All right, thank you everybody.

9 PRESS: I had it one last --

10 RUDY GIULIANI: We'll take.

11 PRESS: You allege that Donald Trump has won by a
12 landslide. We've seen that a lot of your lawsuits and in
13 fact lawyers have been kind of dropping like flies.

14 What do you say to those people who call this a
15 landslide just on the other side, why didn't this and also
16 why didn't this --

17 RUDY GIULIANI: What -- what fake network do you
18 come from?

19 PRESS: I don't come from a fake network. In
20 fact, I am completely independent and have no one above my
21 head.

22 RUDY GIULIANI: Oh, my goodness. Well, first of
23 all, our cases haven't been dismissed. We only have --

24 PRESS: Over 20 --

25 JENNA ELLIS: Look at the plaintiffs who are

1 involved.

2 RUDY GIULIANI: It's not our case, ma'am.

3 PRESS: 20.

4 RUDY GIULIANI: Don't lie to people. Ma'am,
5 ma'am, ma'am, you are lying. You're lying. You're lying.

6 Well, continue to lie.

7 PRESS: Way over their head.

8 RUDY GIULIANI: Ma'am, ma'am, ma'am, ma'am, ma'am
9 -- okay, let me answer the question. Let me answer the
10 question. The answer to the question is we don't have a
11 lot of lawsuits, we only have three. Our lawsuits have
12 not been dropped all over the place.

13 We just -- we just --

14 PRESS: -- go away --

15 RUDY GIULIANI: Well, you're a totally
16 discourteous person. I'm going to finish my answer.

17 PRESS: I'm actually really not.

18 RUDY GIULIANI: I'm going to finish my answer.

19 The fact is we have very, very few lawsuits. The
20 lawsuits you're talking about have been brought by private
21 individuals and groups. Most of them were dismissed for
22 lack of standing. Probably correctly, because they were
23 brought before the election took place.

24 The election is now over. The only lawsuit we
25 have withdrawn is the one where we got the relief that we

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1 wanted, and that's the one in Michigan. We also have
2 another lawsuit in Michigan that will accomplish the other
3 objectives of what we want to do in Michigan, so it's
4 silly to have two competing lawsuits.

5 The only lawyer that left a case, left because he
6 was threatened; his family was threatened, his children
7 were threatened and so was the other lawyer. Yeah, that's
8 true, we have a little difficulty getting lawyers because
9 our lawyers get threatened with being killed because of
10 the ridiculous way in which you cover this and the
11 ridiculous way in which you cover --

12 PRESS: You haven't seen how I've covered this.

13 RUDY GIULIANI: I'm not talking about you, I'm
14 talking about everybody but I get a pretty good sense,
15 from the way you handle yourself, how you cover it.

16 All right, we're finished with you now.

17 One last question. One last question from a --
18 one last question. One last question. One last question
19 from a reasonable, civil person. You are not. Yes.

20 PRESS: I'm not a reasonable person?

21 RUDY GIULIANI: No, her, she isn't.

22 Well, we'll find out.

23 PRESS: I'm from Daily Caller.

24 PRESS: Oh, there we go. Great.

25 PRESS: Thank you. If the courts don't

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1 (inaudible) the entire bulk of the evidence to the media
2 to review? And if so, when? Are you going to drag this
3 thing out like the Hunter Biden hard drive again?

4 RUDY GIULIANI: We're not going to drag it out.
5 I mean it's ridiculous for you to say we're dragging it
6 out. Al Gore had a lot more time than we've had and we've
7 had two weeks to investigate. So that's also completely
8 unfair to say we're dragging it out.

9 Also, if we're going to present things in court,
10 if we present it to you, judges are not going to be very
11 happy with us.

12 And finally, I have to tell you, our witnesses
13 don't want to be exposed to the tender mercies of a
14 vicious press. I have great difficulty getting those
15 witnesses that I did reveal to allow me to do it.

16 They don't trust you, they don't like you. They
17 think you put their lives in jeopardy with the spin that
18 you put on what's going on here and with the unfairness in
19 which you cover it. It's not easy to reveal the things
20 that they tell me.

21 PRESS: So the answer is no?

22 RUDY GIULIANI: The answer is I can't do it
23 because I can't put a witness's life in jeopardy or a
24 person who thinks their life is in jeopardy. This woman
25 tells me we have lawyers dropping out of the case.

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1 We have lawyers dropping out of the case because
2 they're being threatened with destruction of their
3 careers, destruction of their livelihood and in some cases
4 destruction of their lives.

5 That comes about because of the hysterical way in
6 which you have covered Donald Trump and his
7 administration.

8 But we're going to change all that.

9 We're going to go to court, we're going to prove
10 it in court. I would love to release all the information
11 that I have. I would love to give it to you all, except
12 most of you wouldn't cover it. A few of you would and
13 then we'd have half the American people probably informed.

14 The censorship that is going on in this country
15 right now by big tech and by big media is almost as
16 dangerous as the election fraud that we're revealing.
17 Maybe just as dangerous. We're headed to a very bad place
18 when it is not inappropriate that a Venezuelan company
19 counted our votes. Thank you.

20 (End of news conference.)

21

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23

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C E R T I F I C A T E

I, TERRI NESTORE, Certified Shorthand Reporter/
Transcriptionist, do hereby certify that I was authorized
to transcribe the foregoing recorded proceeding, and that
the transcript is a true and accurate transcription of my
shorthand notes, to the best of my ability, taken while
listening to the provided recording.

I further certify that I am not of counsel or
attorney for either or any of the parties to said
proceedings, nor in any way interested in the events of
this cause, and that I am not related to any of the
parties thereto.

Dated this 18th day of December, 2020.



TERRI NESTORE, CSR 5614, RPR, CRR

Exhibit 33

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File:
20201119 MUST-SEE Tucker Carlson ABANDONS Trump's
election fraud case on air

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1 TUCKER CARLSON: For more than a week,
2 Powell has been all over conservative media with
3 the following story: This election was stolen by
4 a collection of international leftists, who
5 manipulated vote tabulating software in order to
6 flip millions of votes from Donald Trump to Joe
7 Biden.

8 The other day on television, Powell said of
9 Trump that when the fraud is finally uncovered,
10 quote, I think we'll find he had least 80 million
11 votes.

12 In other words, rigged software stole about
13 seven million votes in this election.

14 Hear some of what Powell said today about
15 the software.

16 Sidney POWELL: One of its most
17 characteristics features is -- is its ability to
18 flip votes. It can set and run an algorithm that
19 probably ran all over the country to take a
20 certain percentage of votes from President Trump
21 and flip them to President Biden; which we might
22 never have uncovered had the votes for President
23 Trump not been so overwhelming in so many of these
24 states that it broke the algorithm that had been
25 plugged into the system, and that's what caused

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1 them to have to shut down in the states they shut
2 down in.

3 TUCKER CARLSON: That was a few hours ago,
4 but Sidney Powell has been saying similar things
5 for days.

6 On Sunday night we texted her after
7 watching one of her segments. What Powell was
8 describing would amount to the single greatest
9 crime in American history: Millions of votes
10 stolen in a day, democracy destroyed, the end of
11 our centuries-old system of self-government. Not
12 a small thing.

13 Now, to be perfectly clear, we did not
14 dismiss any of it. We don't dismiss anything
15 anymore; particularly when it's related to
16 technology. We've talked to too many Silicon
17 Valley whistleblowers. We have seen too much.

18 After four years, this may the single most
19 open-minded show on television. We literally do
20 UFO segments; not because we're crazy or had even
21 been interested in the subject, but because there
22 is evidence that UFOs are real, and everyone lies
23 about it.

24 There's evidence that a lot of things that
25 responsible people used to dismiss out of hand as

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1 ridiculous are, in fact, real.

2 And we don't care who mocks it. The louder
3 the Yale Political Science Department and the
4 staff at the Atlantic Magazine scream conspiracy
5 theory, the more interested we tend to be. It's
6 usually a sign you're over the target.

7 A lot of people with impressive setting
8 credentials in this country are frauds. They have
9 no idea what they're doing. They're children
10 posing as authorities, and when they're caught,
11 they lie and then they blame you for it.

12 We see that every day. It's the central
13 theme of this show, and will continue to be.

14 So that's a long way of saying we took
15 Sidney Powell seriously. We have no intention of
16 fighting with her. We've always respected her
17 word. We simply wanted to see the details. How
18 could you not want to see them?

19 So we invited Sidney Powell on the show.
20 We would have given her the whole hour. We would
21 have given her the entire week, actually, and
22 listened quietly the whole time at rapt attention.
23 That's a big story.

24 But she never sent us any evidence; despite
25 a lot of requests, polite requests. Not a page.

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1 When we kept pressing, she got angry and told us
2 to stop contacting her.

3 When we checked with others around the
4 Trump campaign, people in positions of authority,
5 they told us Powell has never given them any
6 evidence either; nor did she provide any today at
7 the press conference.

8 Powell did say that electronic voting is
9 dangerous. And she's right. We're with her
10 there. But she never demonstrated that a single
11 actual vote was moved illegitimately by software
12 from one candidate to another. Not one.

13 So why are we telling you this? We're
14 telling you this because it's true. And in the
15 end that's all that matters, the truth. It's our
16 only hope. It's our best defense.

17 BRIAN TYLER COHEN: Do you realize how far
18 into the fringes you have to be for Tucker Carlson
19 to abandon you? For Tucker Carlson to indicate
20 that you're full of it? Because, apparently,
21 Trump's attorney Sidney Powell just found out.

22 And bear in mind, this isn't me giving
23 Tucker Carlson credit, because he may unilaterally
24 be responsible for spreading more disinformation
25 to those on the right than any other person in

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1 this country.

2 What this is, is a referendum on just how
3 off-the-rails delusional Sidney Powell is, that
4 even the guy who, by his own admission, spouts off
5 about UFOs isn't buying her story.

6 Well done, Sidney.

7 Now, Powell did eventually respond to this
8 saying, quote: Apparently Mr. Carlson missed the
9 news conference today. I would continue to
10 encourage him and all journalists to review all
11 the materials we've provided so far and conduct
12 their on investigations. Evidence continues to
13 pour in, but a five-minute television hit is not
14 my focus now. Collecting evidence and preparing
15 the case are my top priorities.

16 And this has been the excuse all along,
17 that they have much evidence, mountains of
18 evidence, but she just can't show anyone.

19 Right. And my girlfriend is an
20 international super model, but you can't talk to
21 her right now because she's not at home, she's in
22 Canada.

23 And while we wait for this supposed
24 devastating avalanche of irrefutable evidence,
25 consider what's happened in every other court

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1 appearance for the Trump campaign. Out of 31
2 cases, the Trump team has lost 30 of them. They
3 are literally one for 31 in the courts.

4 Because while publicly they might claim to
5 have all the evidence that observers weren't
6 allowed to oversee the counting, or that dead
7 people voted, or that the whole process was rife
8 with fraud; when they have to actually tell the
9 truth in a courtroom, they suddenly change their
10 tune completely.

11 Meaning, quite simply, that when people
12 like Sidney Powell tell you that they've got
13 evidence proving Trump won, they are lying.

14 But, hey, maybe you're thinking that you
15 just want to give Powell the benefit of the doubt
16 and hear her out. Sure.

17 Here's what she had to say in her latest
18 press conference.

19 Sidney POWELL: -- here and uncovering more
20 by the day is the massive influence of communist
21 money through Venezuela, Cuba, and likely China,
22 in the interference with our elections here in the
23 United States.

24 The Dominion voting system, the Smartmatic
25 technology software, and the software that goes in

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1 other computerized voting systems here as well,
2 not just Dominion, were created in Venez- -- in
3 Venezuela at the direction of Hugo Chavez to make
4 sure he never lost an election after one
5 constitutional referendum came out the way he did
6 not want it to come out.

7 We have one very strong witness who has
8 explained how it all works. His affidavit is
9 attached to the pleadings of Lin Wood and the
10 lawsuit he filed in Georgia. It is a stunning
11 detailed affidavit, because he was with Hugo
12 Chavez while the -- he was being briefed on how it
13 worked.

14 BRIAN TYLER COHEN: That Cuba, China and
15 Venezuela all conspired to interfere in our
16 election through a plot concocted by Hugo Chavez,
17 the president of Venezuela who died in 2013, with
18 the help of his Dominion voting software, all
19 under the cloak of darkness to ensure that Donald
20 Trump would be deprived of a second term.

21 Do I need to say more?

22 The simple fact is this: Sidney Powell can
23 claim whatever she wants. She can allege fraud
24 and switched ballots and even dead foreign leaders
25 and acting plots to overthrow our government; but

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1 the burden of proof lies with her. And unless she
2 can actually go ahead and prove it, then she looks
3 like every other tinfoil-hat lunatic spouting
4 conspiracy theories they found on the internet.

5 And here's the thing: What Sidney Powell
6 is doing doesn't look good on either side of the
7 aisle. From the left, she obviously looks like
8 the lying grifter that she is.

9 But even on the right, if your earnest goal
10 is to see Trump's claims adjudicated, parading
11 this woman around who keeps promising evidence
12 that has never once managed to materialize, is
13 making the entire process look like nothing more
14 than the butt of a bad joke. She's an
15 embarrassment.

16 A point that even Tucker Carlson seems to
17 be able to pick up on; which is weird, because I
18 was totally under the impression that Trump only
19 hired the best people.

20 There's also the possibility that she's
21 just cashing in. Here is clearly a job that no
22 one else wants; and while she might not have a
23 snowball's chance in hell of winning any court
24 cases, the only person she has to impress is
25 Donald Trump.

1 So she'll go out there and perform for an
2 audience of one, and collect her paycheck; because
3 at the end of the day, remember this, for
4 republicans, it always comes down to money.

5 So regardless of her reasoning, do yourself
6 a favor and ignore this woman, and the circus that
7 she's brought with her.

8 Donald Trump has lost the election. And no
9 matter how hard he tries with these last-minute
10 despotic antics, he's not going to overturn the
11 results of this election. But he'll go down in
12 history for trying to, and Sidney Powell's name
13 will be right there alongside his for doing her
14 best to destroy our democracy.

15 If you like this video, please check out my
16 podcast No Lie with Brian Tyler Cohen, where I
17 take a deep dive into the week's most important
18 stories and interview major players in politics,
19 including Kamala Harris, Katie Porter, Adam
20 Schiff, Nancy Pelosi, Eric Swalwell, Mary Trump,
21 Al Franken, Cory Booker, and many, many more.

22 Again, that's No Lie with Brian Tyler
23 Cohen, available anywhere you listen to podcasts.

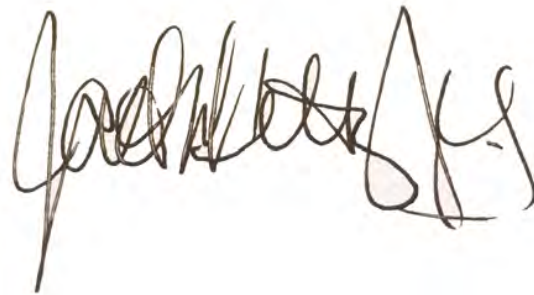
24 (End of the recording.)
25

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C E R T I F I C A T E

I, JACKIE MENTECKY, do hereby certify that
I was authorized to transcribe the foregoing recorded
proceeding, and that the transcript is a true and
accurate transcription of my shorthand notes to the best
of my ability taken while listening to the provided
recording.

Dated this 28th day of December, 2020.

A handwritten signature in dark ink, appearing to read "Jackie Mentecky", is written over a horizontal line.

JACKIE MENTECKY

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Exhibit 34



Exhibit 35

Georgia officials certify election results showing Biden win

By KATE BRUMBACK November 21, 2020



Click to copy



ATLANTA (AP) — Georgia's governor and top elections official on Friday certified results showing Joe Biden won the presidential race over Republican President Donald Trump, bringing the state one step closer to wrapping up an election fraught with unfounded accusations of fraud by Trump and his supporters.

Secretary of State Brad Raffensperger certified results reported by the state's 159 counties that show Biden with 2.47 million votes, President Donald Trump with 2.46 million votes and Libertarian Jo Jorgensen with 62,138. That leaves Biden leading by a margin of 12,670 votes, or 0.25%.

with unfounded accusations of fraud by Trump and his supporters.

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Later Friday, Gov. Brian Kemp certified the state's slate of 16 presidential electors. In an announcement streamed online, Kemp did not clearly endorse the results. Instead he said the law requires him to "formalize the certification, which paves the way for the Trump campaign to pursue other legal options and a separate recount if they choose."

The Republican governor hasn't stepped forward to defend the integrity of this year's elections amid attacks by Trump and other members of his own party, who claim without evidence that the presidential vote in Georgia was tainted by fraud. Kemp has neither endorsed Trump's fraud claims nor backed Raffensperger, a fellow Republican, in his assertion that the election was conducted fairly.

Trump's endorsement two years ago helped Kemp win a heated Republican primary and eke out a narrow general election victory over Democrat Stacey Abrams. Even after losing the White House, Trump is expected to remain a powerful influence with GOP voters in the upcoming Senate runoffs in Georgia as well as in 2022, when Kemp will have to seek reelection.

The counties' results were affirmed by a hand count of the 5 million ballots cast in the race, according to results released by the secretary of state's office. The tally resulted from an audit required by a new state law and wasn't in response to any suspected problems with the state's results or an official recount request. Raffensperger said the hand tally confirmed Biden's victory.

Kemp said Friday that he was concerned that the audit looked only at ballots, not the signatures on the absentee ballot applications or absentee ballot envelopes.

"As a former Secretary of State, he is the first to know and confirm that a signature is matched twice prior to an absentee ballot being counted," Deputy Secretary of State Jordan Fuchs said in a statement.

In fact, the signatures on absentee ballot applications and envelopes are required to be checked when they are received. The audit is only meant to ensure that the voting machines counted the ballots correctly, Raffensperger's office has said.

Two years ago, when he was secretary of state, Kemp pushed back forcefully against an outcry from Democrats who accused him of suppressing voter turnout to improve his odds of winning the gubernatorial election. At the time, he insisted that Georgia's laws "prevent elections from being stolen from anyone."

At a news conference at the state Capitol on Friday morning, before the results were certified, Raffensperger reiterated his confidence in the 2020 elections.

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"Working as an engineer throughout my life, I live by the motto that numbers don't lie," he said. "As secretary of state, I believe that the numbers that we have presented today are correct. The numbers reflect the verdict of the people, not a decision by the secretary of state's office or of courts or of either campaign."



Trump's election lawsuits plagued by elementary errors

“Working as an engineer throughout my life, I live by the motto that numbers don’t lie,” he said. “As secretary of state, I believe that the numbers that we have presented today are correct. The numbers reflect the verdict of the people, not a decision by the secretary of state’s office or of courts or of either campaign.”

Raffensperger’s office stumbled earlier in the day when it prematurely announced the certification while it was still unfinished. Forty minutes later, a corrected news release was sent out saying that certification was still to come. The momentary slip was yet another moment of drama in a race that has been full of it.

Now that the results are certified, Trump’s campaign will have two business days to request a recount since the margin is within 0.5%. That recount would be done using scanning machines that read and tally the votes and would be paid for by the counties, the secretary of state’s office has said.

The hand count for the audit produced some slight differences from the previous machine tally, but no individual county showed a variation in margin larger than 0.73%, and the variation in margin in 103 of the state’s 159 counties was less than 0.05%, the secretary of state’s office said. During the audit, several counties discovered previously uncounted ballots and had to recertify their results.

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“It’s quite honestly hard to believe that during the audit thousands of uncounted ballots were found weeks after a razor-thin outcome in a presidential election,” Kemp said. “This is simply unacceptable.”

Raffensperger said Friday that he plans to propose legislative changes aimed at increasing trust in the results, including allowing state officials to intervene in counties that have systemic problems in administering elections, requiring photo ID for absentee voting and adding stricter controls to allow for challenges to voters who might not live where they say.

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“These measures will improve the security of our elections, and that should lead to greater public trust,” he said.

Kemp said he also looked forward to working with lawmakers to address election concerns.

Raffensperger, a self-described “passionate conservative,” has endured intense criticism and insults from fellow Republicans — from the president to the chair of the state Republican Party — over his handling of the election. He acknowledged their feelings on Friday.

“Like other Republicans, I’m disappointed our candidate didn’t win Georgia’s electoral vote. Close elections sow distrust. People feel their side was cheated,” he said.

Biden is the first Democratic presidential nominee to carry the state since 1992.



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Biden is the first Democratic presidential nominee to carry the state since 1992.

Associated Press reporters Ben Nadler and Sudhin Thanawala in Atlanta, and Russ Bynum in Savannah, Georgia, contributed to this report.

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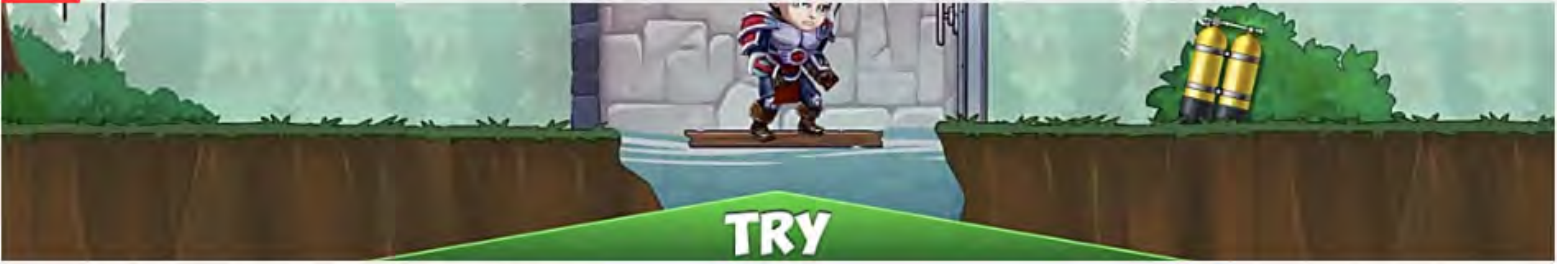
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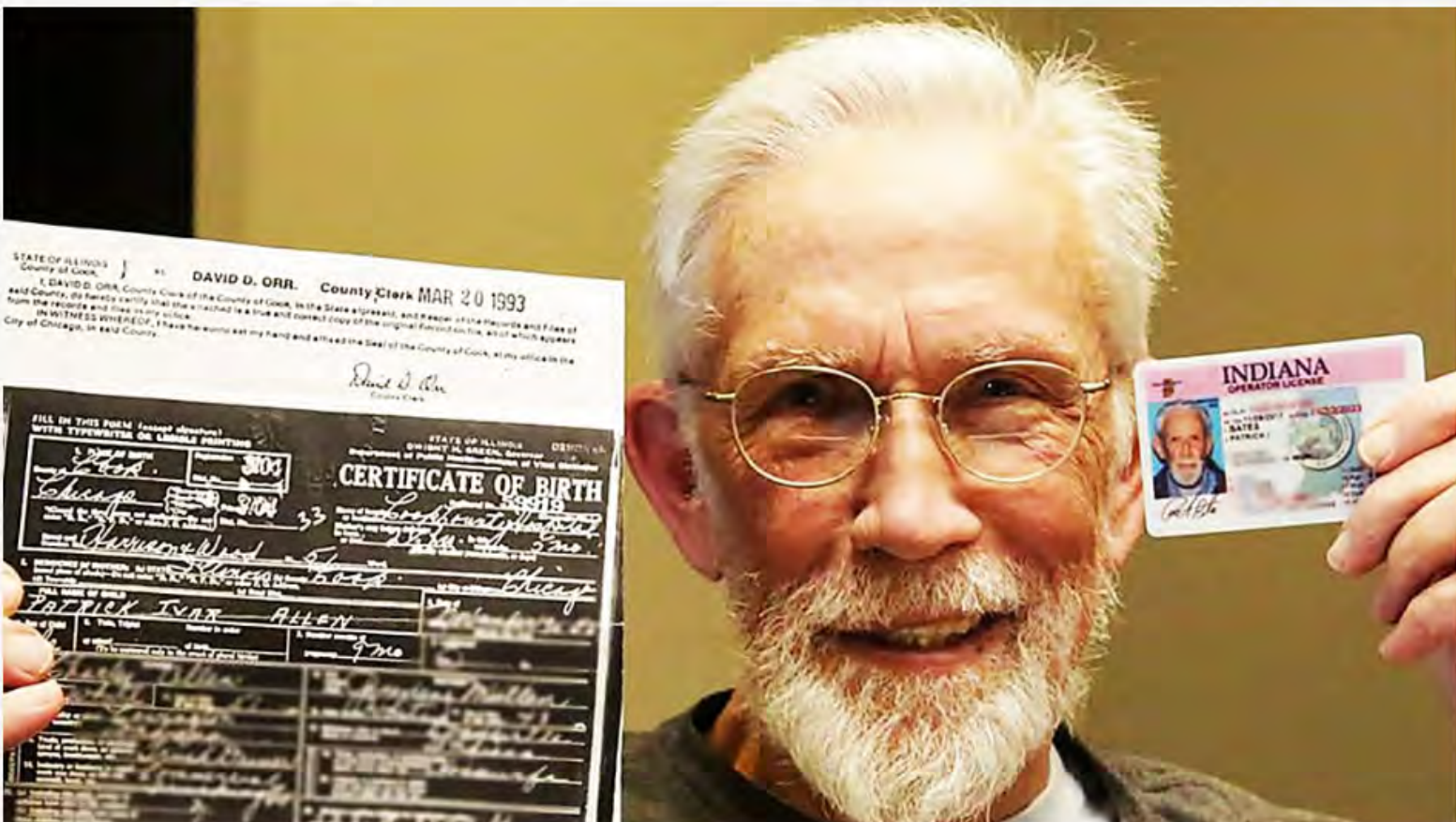
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Sidney Powell It will be BIBLICAL

(20:40 min)

TRANSCRIPT OF VIDEO-RECORDED INTERVIEW

SIDNEY POWELL

ROB SCHMITT

MARK HALPERIN

Transcribed By:
TERRI NESTORE
CSR No. 5614, RPR, CRR

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1 ROB SCHMITT: All right, we now have Sidney
2 Powell on the phone. We got the little gremlins out of
3 the system there, whatever the problem was. Sidney if you
4 can hear us, great to talk with you tonight.

5 SIDNEY POWELL: Yes.

6 ROB SCHMITT: How you doing?

7 And it's good to talk with you, as always.

8 I want to start off with just the ruling. The
9 biggest news out tonight is this Pennsylvania ruling from
10 this Federal District Court judge.

11 What do you make of that?

12 SIDNEY POWELL: Yes. Well, you know, each of the
13 District Court judges has their own particular perspective
14 on things, and I think that judge was appointed by
15 President Obama. We really don't expect to win a lot of
16 the District Court cases, but ultimately the Court of
17 Appeals and the Supreme Court are -- will have to get it
18 right. We're very clear on the law and the facts on
19 multiple issues, and we haven't even begun to present the
20 big fraud case yet that I am still working on, and it's
21 going to be a blockbuster.

22 ROB SCHMITT: I mean, it's interesting,
23 obviously. I mean you guys had the news conference this
24 week. There was a lot of compelling stuff in there. It
25 sounded like you guys were making progress going down a

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1 road of investigation but as I think anybody understands,
2 when you're trying to lay out a case, it takes time to
3 find out what you have.

4 You had a bit of a rub with Tucker Carlson this
5 week, who basically said you didn't have any evidence,
6 when they asked you to come on. What is the truth of the
7 matter there? Because that made a lot of news.

8 SIDNEY POWELL: Oh, yes. Well, he sent me some
9 very abrasive and disrespectful emails or text messages
10 and I responded politely, offering him a different person
11 as a witness who could explain it. I simply didn't have
12 time to do it then, and I sent him a copy of one of the
13 compelling affidavits that we have in the case, and
14 apparently that wasn't sufficient for him. He was having
15 a little bit of a tantrum. But I didn't see or hear what
16 he said and I haven't had time to listen to what he said
17 after that. I'm just proceeding on my course of getting
18 the case ready to prove in a court, which is where we
19 prove cases of law, not in the media.

20 ROB SCHMITT: What is your timeline? As you look
21 at this, what's the timeline, you think, before you can
22 put out some of this evidence that can really -- if you
23 want to shut the media up, where they say that you guys
24 have nothing, when will you have some of this stuff that's
25 this hard core evidence and paper in writing?

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1 SIDNEY POWELL: Well, frankly, the affidavits
2 we've already introduced are hard core evidence. They're
3 firsthand testimony of witnesses who saw how and why the
4 system was created and how it worked to accomplish the
5 objective for Hugo Chavez. There are people who saw
6 ballots being destroyed. We've got evidence from people
7 who saw fake ballots being created.

8 We've got all kinds of different evidence.

9 And then we've got the statistical and
10 mathematical evidence that's absolutely irrefutable. I
11 mean, a coin doesn't land on the same side when you flip
12 it 186,000 times. You can't just inject 86,000 Biden
13 votes and expect anybody to believe those are real.

14 And they're not. No matter how you analyze the
15 statistics, whether it's a predictive model or the actual
16 data as it comes in, it doesn't hold water.

17 And we've got other testimonial evidence that
18 appears to be coming in now to indicate the democrats
19 literally added 35,000 votes to every democratic candidate
20 to begin with.

21 ROB SCHMITT: 35. In any particular state or --
22 you say 35,000. Where?

23 SIDNEY POWELL: We've got it definitely all over
24 one state, and I would be willing to bet it happened
25 everywhere.

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1 ROB SCHMITT: And when you lay all this out, and
2 you're going to do this in court, do you have what you
3 think is irrefutable evidence that will make up the minds
4 of millions of American people?

5 SIDNEY POWELL: Well, the burden of proof in
6 court is only a preponderance of the evidence. It's not
7 beyond a reasonable doubt. That's the criminal standard.

8 But frankly, with everything we've got, these
9 should be criminal prosecutions at a significant level for
10 fraud and conspiracy to defraud, provable beyond a
11 reasonable doubt.

12 There are hundreds of thousands of people in our
13 criminal system right now in prison, who were convicted on
14 far less evidence of guilt than we have here.

15 MARK HALPERIN: Sidney Powell, I want you to
16 react to something that I've seen this republican senator
17 from Pennsylvania, Pat Toomey just said in reaction to the
18 District Court judge's decision. The District Court judge
19 is someone who's very close to Pat Toomey. Senator Toomey
20 says that President Trump has now, quote, exhausted all
21 plausible legal options to challenge the result of the
22 presidential race in Pennsylvania. Is that true?

23 SIDNEY POWELL: No, that's not true at all.

24 MARK HALPERIN: Can you explain why the senator's
25 wrong?

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1 SIDNEY POWELL: We've hardly begun to fight.

2 MARK HALPERIN: Can you explain, though, why is
3 the senator wrong?

4 SIDNEY POWELL: Well, he's wrong because
5 Pennsylvania was one of the hotbeds of many varieties of
6 fraud and criminal acts that the Department of Justice,
7 frankly, should be in there prosecuting, and we're going
8 to dump a whole lot of them into evidence in our fraud
9 case that we're going to file in Pennsylvania.

10 MARK HALPERIN: Why do you think the Justice
11 Department isn't being more aggressive in following up on
12 what you see?

13 SIDNEY POWELL: I think the Justice Department
14 has known about this issue for a long time and turned a
15 blind eye to it.

16 MARK HALPERIN: Why, though?

17 SIDNEY POWELL: I wonder how much the CIA
18 actually had a role in starting this kind of program to
19 begin with, to use on other countries.

20 MARK HALPERIN: Why would Donald Trump's Justice
21 Department not be interested in this?

22 SIDNEY POWELL: Well, you know, I wish Donald
23 Trump had as much control over the Justice Department as
24 people think he does. It's taken on a life of its own.

25 I don't think even Bill Barr has the control over

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1 this Justice Department that he would like to have because
2 there are so many lawyers in so many different places
3 doing whatever it is they want to do and ignoring the
4 standards and practices that historically created the
5 Justice Department to seek justice, and not convictions.

6 I mean, I wrote a book about that back in 2014.

7 I mean, we've been on this increasingly bad path
8 for decades now and it's done nothing but get worse
9 because nobody's told the truth and stood up for the
10 truth, but Americans are now. They're livid about this,
11 and they could see it. Everybody saw it election night.
12 They saw votes being subtracted from President Trump and
13 appearing on the Biden side of the scale, and that's
14 exactly what this Dominion system was designed to do.

15 We have eyewitness testimony to its entire
16 creation for that very purpose.

17 ROB SCHMITT: There have been warnings about this
18 system. We were talking about it earlier, Sidney. I
19 mean, you had Senators Warren and Klobuchar that made a
20 big stink about the 2018 midterms, saying that they don't
21 trust Dominion, that they saw evidence that votes could be
22 switched using these systems. These are democrats --

23 SIDNEY POWELL: Right.

24 ROB SCHMITT: -- who ran for president.

25 What I don't understand is how does this get

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1 ignored? I mean, this is a nationwide -- this is a
2 democracy-shocking scandal, if it is true.

3 SIDNEY POWELL: It is.

4 ROB SCHMITT: And it's just so big I can't even
5 wrap my head around it. I just wonder, how does this
6 happen?

7 SIDNEY POWELL: Well, that's exactly how it
8 happens because it's so big, nobody wants to wrap their
9 head around it, nobody wants to untie all the little knots
10 that go into it, but we have to if we're going to be a
11 constitutional republic.

12 This cannot go on. Our votes must be counted
13 fair and true. Every legal vote is entitled to be
14 counted, and every illegal vote nullifies the vote of an
15 American citizen and our public will of we the people.
16 It's absolutely counter to everything this country was
17 founded on. So we have got to get this fixed now.

18 I can't unsee it, I'll tell you that. I
19 certainly cannot unsee what I have seen, and I am going to
20 make sure everybody else knows everything I have seen too
21 because we've got to hold our government institutions
22 accountable and do better than this by each other, and it
23 does cut across both political parties, it cuts across
24 generations now -- or at least multiple decades of this
25 kind of corruption that's got increasingly more

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1 sophisticated. You just smudge the edge of a ballot and
2 stick it through the machine and the ballot would be
3 rejected, but now they can literally drag and drop
4 hundreds of thousands of votes wherever they want 'em.

5 And everybody knew, when they bought this system,
6 that was one of the features of the system.

7 We've got people lying now and saying that things
8 that happened, that ran people out of voting areas and --
9 we've got tons of evidence. It's so much, it's hard to
10 pull it all together.

11 ROB SCHMITT: How big of a -- if this happened,
12 how big of a conspiracy, how many people would have had to
13 have been in on something like this?

14 SIDNEY POWELL: Oh, gosh. Probably thousands,
15 including the people running the machines at each of the
16 polling centers. We know, for example, that one of the
17 higher ups of Dominion went to Detroit the night of the
18 election to handle things themselves, and we also have
19 evidence that there were any number of VPN lines open to
20 the internet, for foreign actors to be meddling in it.

21 ROB SCHMITT: Has anybody given you an
22 explanation as to why they had to turn the machines off?

23 You talk about how the machines got turned off.

24 SIDNEY POWELL: Well, yes, our witness from
25 Venezuela who saw it all created and how it worked said

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1 that he knew, as soon as the machines were turned off in
2 those key states, it was because we the people, in voting
3 Trump -- in voting for Trump in a landslide election, had
4 essentially broken the algorithm that had been
5 preprogrammed into the machine.

6 So they had to stop counting in those states and
7 areas and backfill the vote with fraudulent mail-in
8 ballots or whatever means they used to do it, whether they
9 just injected numbers or trashed votes for Trump otherwise
10 and changed the numbers, I don't know exactly how they did
11 it right now in each spot, but that's essentially the way
12 it worked.

13 ROB SCHMITT: Let me ask you about the state of
14 Georgia. Obviously yesterday, you know, the governor
15 there, he certified the election for Joe Biden. It's
16 about 12,000 votes.

17 And what you see, will Georgia switch?

18 SIDNEY POWELL: Yeah, that's a total farce.
19 Georgia probably going to be the first state I'm going to
20 blow up, and Mr. Kemp and the Secretary of State need to
21 go with it because they're in on this Dominion scam with
22 their last-minute purchase or award of a contract to
23 Dominion of a hundred million dollars.

24 The State Bureau of Investigation for Georgia
25 ought to be looking into the financial benefits received

1 by Mr. Kemp and the Secretary of State's family about that
2 time.

3 And another benefit Dominion was created to award
4 is what I would call election insurance. That's why Hugo
5 Chavez had it created in the first place. But I also
6 wonder where he got the technology, where it actually came
7 from, because I think it's Hammer and Scorecard from the
8 CIA.

9 ROB SCHMITT: Just to clarify, you're saying that
10 Governor Kemp, who's been a longtime ally of the
11 president, is directly involved, because of financial
12 benefit, in a conspiracy to defeat the president in
13 Georgia?

14 SIDNEY POWELL: We have certainly been told that
15 there is evidence of that and would warrant an
16 investigation, if anybody were actually going to do an
17 honest investigation.

18 MARK HALPERIN: What more could you tell us about
19 that alleged conspiracy, the governor's involvement?

20 SIDNEY POWELL: Yeah, I can't give you anymore
21 details than that now, but it would certainly warrant an
22 investigation. Had it been reported to me as a law
23 enforcement officer, I would be investigating it
24 steadfastly.

25 MARK HALPERIN: You know, I know you say you want

1 to do your arguing in court -- you are an attorney, you're
2 not a press secretary -- but you all did have a press
3 conference last week. Jordan Sekulow said that there's
4 going to be a filing soon in Georgia that would be
5 explosive. Can you tell us anything, can you make some
6 news with us here tonight, tell us anything new that
7 you're going to present in that filing in Georgia?

8 SIDNEY POWELL: Well, I can't say that yet but
9 hopefully this week we will get it ready to file and it
10 will be biblical.

11 ROB SCHMITT: Biblical. What is the state --
12 where was it the worst? From what you see and what you're
13 alleging, what state was switched the most?

14 SIDNEY POWELL: Oh, that's really hard to say.
15 Georgia is extremely bad. We've got ballots being
16 shredded, ballots being thrown out in trash bags, lying by
17 people working in the center, the votes being switched,
18 the algorithms being run. You name the manner of fraud,
19 and it occurred in Georgia.

20 ROB SCHMITT: These are in the Atlanta areas,
21 counties, those counties, Fulton, DeKalb?

22 SIDNEY POWELL: I think the algorithm ran most
23 probably across the country. Can I say that for sure yet?

24 No, I can't say that for sure yet, but it looks
25 that way, and it looks like 35,000 votes were added to

1 every democratic candidate.

2 ROB SCHMITT: You also talked about this ability
3 of the system -- and I thought this was so interesting
4 when you said it, that it can take a vote and it can make
5 a vote for Biden worth more than a vote for Trump. Do you
6 think that that happened or is that another part of the
7 system that maybe wasn't used?

8 SIDNEY POWELL: No, I think that definitely
9 happened. I think that was the first step with the
10 system, to weight the votes so that a Biden vote is worth
11 1.23, say, and a Trump vote is worth the rest of that, and
12 so the Trump vote is about three-quarters and the Biden
13 vote is one-and-a-quarter and that way you can see the
14 reports, the records of fractional numbers for the votes.

15 It's nuts.

16 ROB SCHMITT: It is. I mean everything you're
17 alleging, frankly, is nuts, which is why I think you're
18 getting so much scrutiny and so much criticism but if it's
19 true -- and we don't know and that's just a simple thing
20 is that we don't know yet if it's true because we can't
21 see what you've seen.

22 SIDNEY POWELL: Right.

23 ROB SCHMITT: I want to ask you about Michigan.
24 Michigan is a bigger margin than the rest of them, it's
25 like maybe 150,000.

1 What are you seeing in Michigan?

2 SIDNEY POWELL: We're seeing essentially the same
3 things in Michigan, except larger number of ballots being
4 stuffed in. It's the old-fashioned stuffing the ballot
5 box, they're just doing it by computer instead of by
6 paper. That's really all it is. They're dragging and
7 dropping files of votes from one person to another instead
8 of just stuffing paper ballots in the ballot box.

9 And, you know, corruption in elections has been
10 going on forever. I remember LBJ saying, you know, send
11 some guys down to the cemetery because those people, if
12 they were alive, would have voted for me and they take the
13 name and the birthday and that's what they did.

14 MARK HALPERIN: So it's Saturday night.

15 Can you preview for us as specifically as you
16 can, what's going to happen this coming week, starting
17 Monday morning. Tell us where you're going to file, what
18 you expect to happen by Friday.

19 SIDNEY POWELL: Well, personally I don't expect
20 to file anything by Monday. I'm hoping we can get it
21 ready by Wednesday. If not, it should be ready by Friday,
22 but it's a massive project to pull this fraud claim
23 together with the evidence that I want to put in to begin
24 with. And remember, it's not -- this isn't a summary
25 judgment motion where we actually have to produce any

1 evidence now. In your typical lawsuit, you just file the
2 statement of what the charges are, without any affidavits
3 or anything.

4 MARK HALPERIN: But you're saying --

5 SIDNEY POWELL: But the way the media is going
6 about this is absolutely ridiculous and unreasonable to
7 expect us to put evidence in right now, although we are --
8 we know election issues are on an expedited schedule, but
9 I could wait a month to file the fraud case and everybody
10 would have to undue their certifications because it's so
11 bad.

12 MARK HALPERIN: But are you saying you're going
13 to file the same case in multiple jurisdictions or in one
14 jurisdiction?

15 SIDNEY POWELL: Each one is a little bit
16 different, depending on what happened in the state; the
17 different manner and means and the evidentiary aspects
18 that support each one. You know, we've got different
19 affidavits from different witnesses in each of the states.

20 So there are going to be some differences between
21 them but there are going to be claims that are identical,
22 some of the legal claims are going to be identical.

23 For example, in a number of states the -- there
24 were modifications to the machine after the statutory
25 cutoff date. That should invalidate every vote cast on

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1 the machine. I mean, Georgia cannot -- there's no way
2 Georgia can proceed to have an election using those
3 machines for the runoff candidates.

4 That's absolutely absurd.

5 ROB SCHMITT: As we wrap this up, Sidney, I think
6 everybody at home right now wants to see this. They want
7 to see what you say you've seen. Is that going to be
8 possible at any point? Are we going to be able to see
9 some of these problems and some of these issues, the way
10 these systems work and the way this Dominion works?

11 SIDNEY POWELL: Yes, and there's actually
12 evidence online now. I mean, we need to try to get our
13 website up-to-date with the complaints that have already
14 been filed but exhibits were attached, for example, to
15 Lin Wood's complaint in Georgia that are remarkable and
16 stunning, including the affidavit of the young man from
17 Venezuela who saw Hugo Chavez create how they did the
18 software, hired people to do it and get it done and then
19 how it worked to make sure he won every election
20 thereafter.

21 ROB SCHMITT: That's just crazy.

22 SIDNEY POWELL: That's what it's designed to do.
23 Their own handbook tells you that these things are
24 features of their system. Are we supposed to think they
25 didn't use the features? Heck, no, they used them and

1 they used them against their own candidates.

2 The democrats used them against Bernie Sanders in
3 2016 and somebody even told him what had been done to him
4 when Hillary Clinton won that primary and he didn't, and
5 instead of standing up for the American people and the
6 right to vote, he sold out.

7 ROB SCHMITT: You're saying Dominion -- the
8 Smartmatic-Dominion system was used in 2016 when Hillary
9 beat Bernie in the primary?

10 SIDNEY POWELL: Yes.

11 ROB SCHMITT: Wow. I don't think we had heard
12 that yet. That's an incredible development right there.

13 SIDNEY POWELL: Yep.

14 ROB SCHMITT: And you say he knows that, Bernie
15 Sanders knows that?

16 SIDNEY POWELL: Yes. The person who sent me the
17 data told me that they informed Bernie Sanders of all
18 their findings and he didn't do anything except get enough
19 money to buy another fabulous house.

20 I'm telling you it's been used for both parties.

21 One of the big problems is that we don't know who
22 was elected by buying their election through Dominion.

23 I'm sure it crosses party lines. I'm not --
24 that's not an accusation against every politician, it's
25 certainly not meant to be, but it means we don't know

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1 which ones got elected that way and how much they knew
2 about how it was being used for or against them --
3 certainly not against them.

4 But I'm reasonably certain at this point that
5 John James was ripped out of his seat and he was entitled
6 to have won that election by the real vote and the same I
7 think is true for Doug Collins in Georgia, and there's no
8 telling how many Congressional candidates should have won,
9 that lost by the addition of 35,000 votes per democrat or
10 the algorithm that they were running against whoever they
11 wanted to target. I mean, you can do it candidate by
12 candidate.

13 MARK HALPERIN: That is something else.

14 ROB SCHMITT: I mean, it's mind blowing.

15 SIDNEY POWELL: It is.

16 ROB SCHMITT: Sidney, what you're alleging, I
17 can't even imagine and I hope that you will join us again
18 to talk about what you continue to find as you continue to
19 investigate.

20 SIDNEY POWELL: I will do that, and I will try
21 and get more stuff up online this week. We've got some --

22 ROB SCHMITT: Or just email it to us.

23 SIDNEY POWELL: Of course people are trying to
24 hack us and everything else.

25 ROB SCHMITT: Right.

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1 SIDNEY POWELL: But democratic Congresswoman
2 Carolyn Maloney wrote the treasury secretary about this
3 very issue in 2003, I think it was.

4 ROB SCHMITT: 17 years ago.

5 SIDNEY POWELL: So people have been complaining
6 about it and the government's done absolutely nothing
7 except whatever it wants to do.

8 So who is really pulling the strings here and
9 choosing the American officials pursuant to the system?
10 Because it's not the people of the United States of
11 America, and that's supposed to be who it is.

12 ROB SCHMITT: It's just something else.

13 And like you said, prominent democrat politicians
14 have complained about the usage of this system in this
15 country. Sidney Powell --

16 SIDNEY POWELL: Right.

17 ROB SCHMITT: -- thank you for joining us tonight
18 on the phone. I know how busy you are, and we appreciate
19 the time.

20 SIDNEY POWELL: Thank you. My pleasure.

21 ROB SCHMITT: Okay.

22 (End of recording.)

23

24

25

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I further certify that I am not of counsel or
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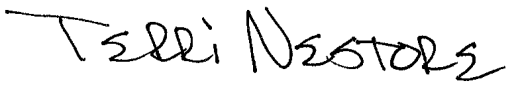

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Exhibit 37

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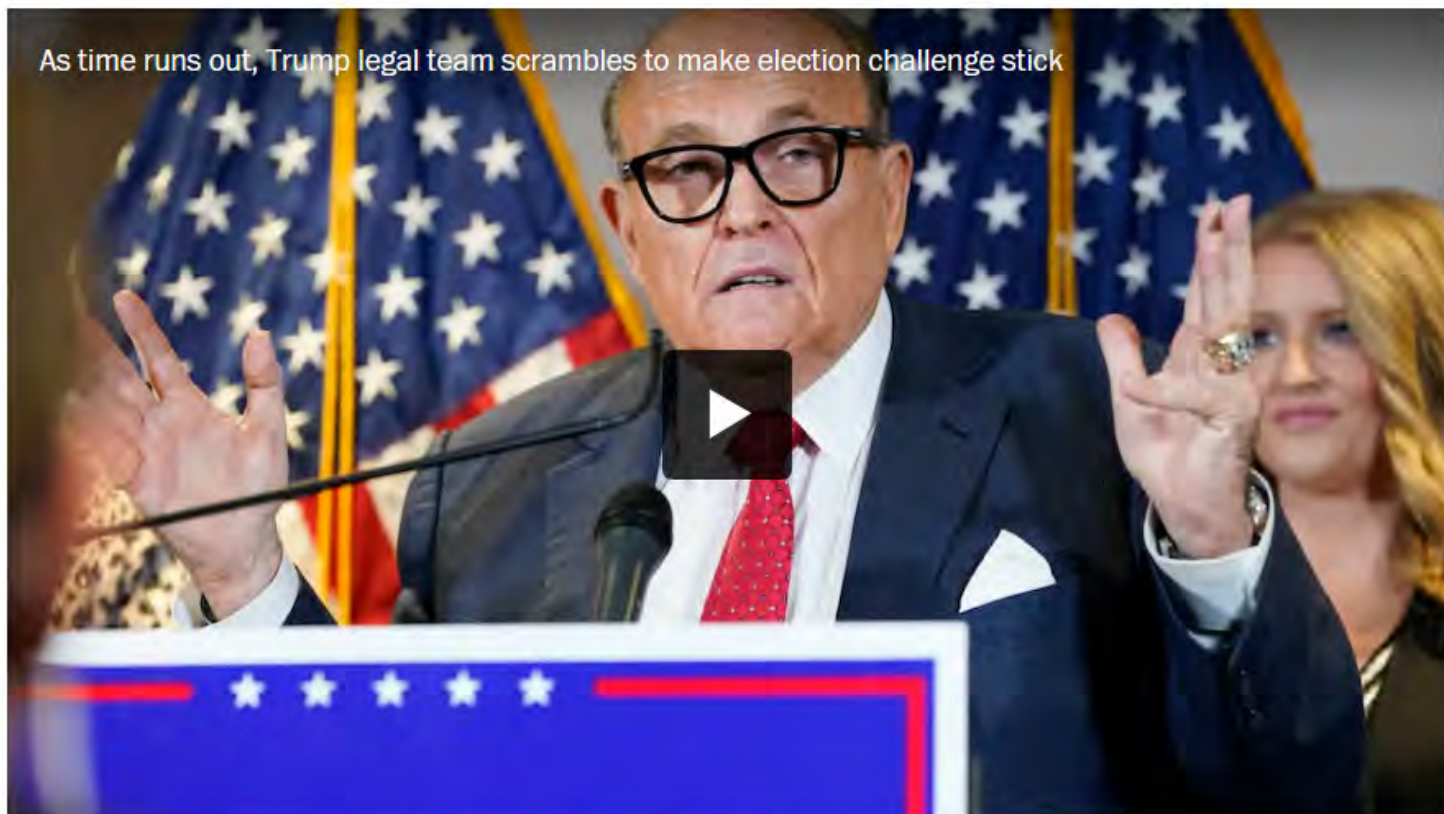
Electoral college vote

Inaugurat

Politics

Chris Christie calls the conduct of Trump's legal team a 'national embarrassment'

As time runs out, Trump legal team scrambles to make election challenge stick



The Post's Jon Swaine analyzes the Trump Campaign's last ditch legal attempts to get the result of the 2020 election overturned. (The Washington Post)

The Post's Jon Swaine analyzes the Trump Campaign's last ditch legal attempts to get the result of the 2020 election overturned. (The Washington Post)

By **Paul Kane** and **Felicia Sonmez**

November 23, 2020 at 4:11 a.m. GMT

+ Add to list

Several prominent Republicans said over the weekend that President Trump's legal arguments had run their course and called on him to allow the presidential transition process to begin.

Chris Christie, a Trump confidant [who helped prepare the president](#) for the debates, called the conduct of Trump's legal team a "national embarrassment." Sen. Patrick J. Toomey (R-Pa.) said Trump had "exhausted all plausible legal options" and urged him to concede. Sen. Kevin Cramer (R-N.D.) said it's time to begin the transition.

The comments mark the latest signs of dissent from within the president's party, with increasingly more Republicans urging Trump to accept the results of the election and move on.

In an interview on ABC News's "This Week," Christie said the president should give up his legal strategy. "Elections have consequences, and we cannot continue to act as if something happened here that didn't happen," he said.





The Post's Ashley Parker explains why some Republicans followed President Trump's lead in denying the reality of the election and the danger they're posing. (The Washington Post)



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“The conduct of the president’s legal team has been a national embarrassment,” Christie added, noting that Trump’s lawyers have made a flurry of fraud allegations but have offered no evidence to back them up in court.

Christie criticized Trump’s lawyers for proffering false conspiracy theories at news conferences and other media appearances.

“They don’t do it in the courtroom,” the 2016 Republican presidential candidate said, suggesting the attorneys are fearful of making baseless arguments under oath before federal judges.

“It must mean the evidence doesn’t exist,” Christie said.

Christie said the Republican Party should focus on trying to win Georgia’s two runoff elections Jan. 5 to secure the Senate majority rather than continuing with its unsuccessful legal challenges of the presidential election results.

5 to secure the Senate majority rather than continuing with its unsuccessful legal challenges of the presidential election results.



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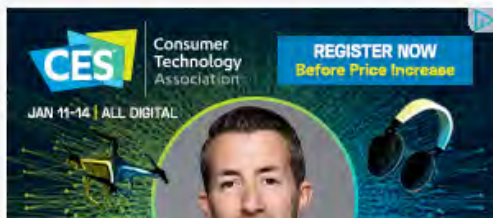
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“The rearview mirror should be ripped off,” Christie said.

The president’s legal team was thrown into tumult Sunday when two Trump attorneys — Rudolph W. Giuliani and Jenna Ellis — released a statement abruptly distancing the campaign from a third attorney, Sidney Powell.

Giuliani, Ellis and Powell appeared at a news conference last Thursday where they made a range of baseless accusations about the integrity of the election. Powell in particular has been vocal in lobbying some of the most convoluted claims, alleging a conspiracy that involved “communist money,” the late Venezuelan president Hugo Chávez and an algorithm favoring Democrats.

At the beginning of the news conference, Giuliani said that he, Ellis, Powell and other attorneys present were “representing President Trump and we’re representing the Trump campaign.” Ellis introduced the group as “an elite strike force team that is working on behalf of the president and the campaign to make sure that our Constitution is protected.”





But on Sunday, Giuliani and Ellis distanced themselves from Powell.

“Sidney Powell is practicing law on her own,” Giuliani and Ellis said in their statement. “She is not a member of the Trump Legal Team. She is also not a lawyer for the President in his personal capacity.”

Two advisers to Trump, who spoke on the condition of anonymity to discuss private conversations, said that the president disliked the coverage Powell was [receiving from Tucker Carlson](#) and others, and that several allies had reached out to say she had gone too far. The advisers also said that she fought with Giuliani and others in recent days.

The president believed she was causing more harm than help. “She was too crazy even for the president,” a campaign official said.

Powell did not immediately respond to a request for comment.





Late Saturday night, [after a federal judge threw out](#) Trump's legal attempt to invalidate millions of votes, Toomey congratulated Biden and Vice President-elect Kamala D. Harris on their victory and encouraged the president to accept that result.

"President Trump has exhausted all plausible legal options to challenge the result of the presidential race in Pennsylvania," Toomey said in a statement, noting that the deciding judge, Matthew W. Brann, is a "longtime conservative Republican."

This result, Toomey noted, followed [Georgia's certification Friday of Biden's victory](#) there and Michigan's GOP legislative leaders rejecting efforts to block the certification of Biden's clear victory in that state.

"I congratulate President-elect Biden and Vice President-elect Kamala Harris on their victory. They are both dedicated public servants and I will be praying for them and for our country," Toomey said.



Sen. Lisa Murkowski (R-Alaska), who congratulated Biden in a statement after his Nov. 7 victory address, also urged Trump to "begin the full and formal transition process" and criticized the president's efforts to pressure state and local officials.

Sen. Lisa Murkowski (R-Alaska), who congratulated Biden in a statement after his Nov. 7 victory address, also urged Trump to “begin the full and formal transition process” and criticized the president’s efforts to pressure state and local officials.

“President Trump has had the opportunity to litigate his claims, and the courts have thus far found them without merit,” Murkowski [said in a tweet Sunday night](#). “A pressure campaign on state legislators to influence the electoral outcome is not only unprecedented but inconsistent with our democratic process.”

Senate Republicans have by and large [avoided commenting on Trump’s actions](#), with more than 40 not responding to requests for comment Thursday and Friday about the president’s effort to have Michigan legislators reject the Biden victory there of more than 150,000 votes.



Republicans are aware that any perceived lack of loyalty to the president could prompt him to attack the defectors — just as Trump did Saturday night when he called Brann a “product of Senator Pat ‘No Tarriffs’ Toomey.”

“No friend of mine,” [Trump tweeted](#).

Even some Trump backers who support pushing ahead with legal challenges said that Biden probably will take office and that the General Services Administration should allow the Democratic transition team access to the federal agencies and key briefings, along with office space and millions of dollars in funding, so they can hit the ground running on Jan. 20.

probably will take office and that the General Services Administration should allow the Democratic transition team access to the federal agencies and key briefings, along with office space and millions of dollars in funding, so they can hit the ground running on Jan. 20.

"I just think that you have to begin that process, give the incoming administration all the time they need," Cramer said Sunday on NBC's "Meet the Press."

Cramer said that the transition process should have begun at least a week ago. But he added that the transition could begin even as Trump's legal team continued to press its cases in the states.

This is, Cramer said, "just a simple legal process."

Josh Dawsey contributed to this report.

6.1k Comments

**Paul Kane**

Paul Kane is The Washington Post's senior congressional correspondent and columnist. His column about Congress, @PKCapitol, appears throughout the week and on Sundays. He joined The Post in 2007. Follow [Twitter](#)

**Felicia Sonmez**

Felicia Sonmez is a national political reporter covering breaking news from the White House, Congress and the campaign trail. She was previously based in Beijing, where she worked for Agence France-Presse and The Wall Street Journal. Follow [Twitter](#)

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Chris Christie knows a few things about national embarrassments.

Like Link Report



Donna%20Shepherd 1 month ago

To use Trump's own vernacular, the only thing worse than a loser is a sore loser

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**Donna%20Shepherd** 1 month ago

To use Trump's own vernacular, the only thing worse than a loser is a sore loser

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**negoziare o morire** 1 month ago

So about that bridge-gate thing? Come on Chris they are not going to ever put you up for president so maybe you can do a little better describing the who and the what that is far more than simply an embarrassment. Messing the bed overs and over is not merely an embarrassment it is a dysfunction and requires some meaningful intervention. I posit that you have some thoughts and feelings about Jared's role throughout this clusterfrig!

Like 1 Link Report

**Try_to_be_rational** 1 month ago

The conduct of the entire Republican party is an embarrassment, Mr. Christie included.

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**Bapario** 1 month ago

Its all about the "Grift" now.....

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"Chris Christie, a Trump confidant who helped prepare the president for the debates, called the conduct of Trump's legal team a "national embarrassment."

Chris Christie as usual slithers around the issues. Trump's legal team is just following orders. It is the conduct of President Trump that is the national embarrassment. But you will not hear Christie say that. Feels like Christy is getting a pass and he should not. His consistent and insistent support of President Trump was also a national embarrassment.

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**Ruegak** 1 month ago

The president believed she was causing more harm than help. "She was too crazy even for the president," a campaign official said.

Exhibit 38



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BIDEN-HARRIS TRANSITION

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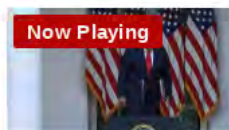
LIVE



Trump legal team disavows association with lawyer Sidney Powell

BY KATHRYN WATSON

NOVEMBER 23, 2020 / 3:52 PM / CBS NEWS



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The Trump campaign is disavowing its association with attorney Sidney Powell after the far-fetched Trump campaign Thursday press conference when she claimed without evidence that the deceased Hugo Chávez, among others, was responsible for rigging the election. The campaign claimed that she "is not a member of the Trump



without evidence that the deceased Hugo Chávez, among others, was responsible for rigging the election. The campaign claimed that she "is not a member of the Trump legal team," even though the president and Trump attorney Rudy Giuliani had previously identified her as being on the team.



In the days since the press conference, Powell has made additional unfounded claims to conservative networks, and her claims have even been questioned by Fox News' Tucker Carlson, after she refused to produce her evidence on the show.

"Sidney Powell is practicing law on her own. She is not a member of the Trump Legal Team. She is also not a lawyer for the President in his personal capacity," said a statement from Giuliani and Trump campaign senior legal adviser Jenna Ellis.

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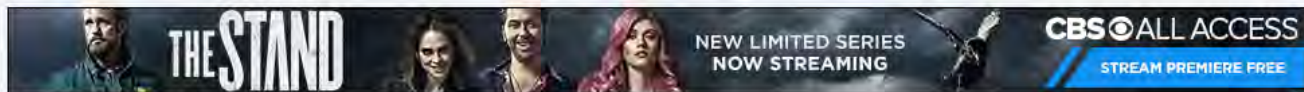
During Thursday's press conference, Giuliani identified Powell as a member of the team defending Mr. Trump, and the president himself identified Powell as someone working for him in a November 14 tweet.

"I look forward to Mayor Giuliani spearheading the legal effort to defend OUR RIGHT to FREE and FAIR ELECTIONS! Rudy Giuliani, Joseph diGenova, Victoria Toensing, Sidney Powell, and Jenna Ellis, a truly great team, added to our other wonderful lawyers and representatives!" Mr. Trump tweeted at the time.

Powell issued this statement to CBS News:

"I understand today's press release," she said. "I will continue to represent #WeThePeople who had their votes for Trump and other Republicans stolen by massive fraud

"I understand today's press release," she said. "I will continue to represent #WeThePeople who had their votes for Trump and other Republicans stolen by massive fraud through Dominion and Smartmatic, and we will be filing suit soon. The chips will fall where they may, and we will defend the foundations of this great Republic. #KrakenOnSteroids"



On Thursday, Ellis called the team giving the press conference, which included Powell, the "elite, strike force team." Powell, Giuliani and Ellis have claimed they're holding back their biggest evidence for court, where they continue to lose lawsuit cases.

Powell was the attorney for General Michal Flynn, the president's former national security adviser who was fired for lying to Vice President Mike Pence about his Russian contacts, and convicted of lying to the FBI about the same thing.

— *Kristen Brown contributed to this report*

First published on November 22, 2020 / 6:21 PM

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Kathryn Watson



Kathryn Watson is a politics reporter for CBS News Digital based in Washington, D.C.

Election 2020

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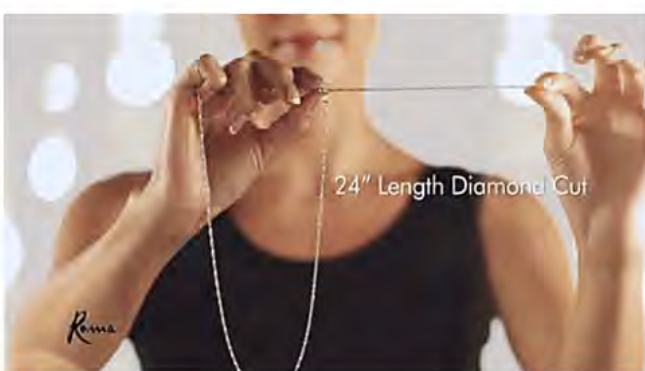
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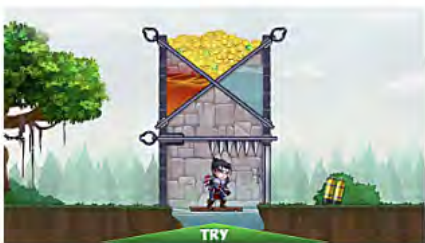
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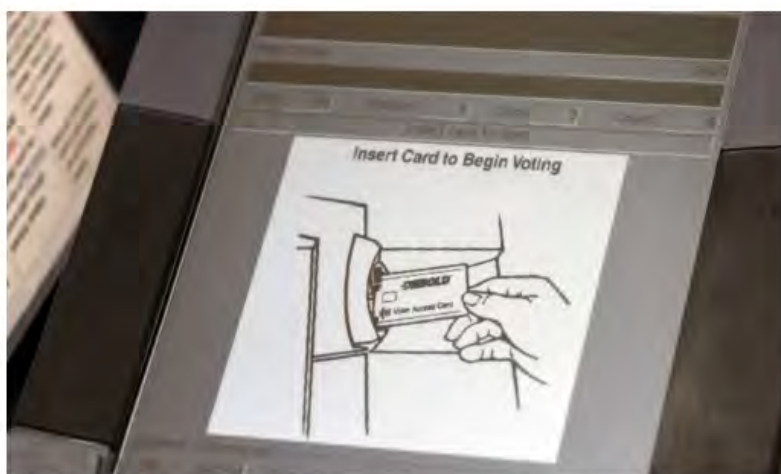
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A touch screen of a voting machine during early voting in Sandy Springs, Ga., on May 9, 2018. (John Bazemore/AP Photo)

ELECTION INTEGRITY

Former Republican Candidate Alleges Hard Evidence of Corruption in US Election System

BY MASOOMA HAQ | November 23, 2020 Updated: November 23, 2020

Print

Russell Ramsland, a former Republican Party candidate who ran in Texas in 2016, claimed in an affidavit, filed as part of an election-related lawsuit in Georgia, that his company found vulnerabilities connected to the Dominion voting system.

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Russell Ramsland, a former Republican Party

candidate who ran in Texas in 2016, claimed in an affidavit, filed as part of an election-related lawsuit in Georgia, that his company found vulnerabilities connected to the Dominion voting system.

In the affidavit ([pdf](#)), which was not signed by a notary, Ramsland said that Allied Security Operations Group, LLC, launched an 18-month probe into the “major EMS providers in the United States, among which is Dominion/Premier.”

According to Ramsland’s affidavit, the “systems contain a large number of vulnerabilities to hacking and tampering,” but did not provide specific evidence to back up the claims. Information included in the affidavit about voter turnout listed towns and counties attributed to being in Michigan, but were in fact in Minnesota.

Russell Ramsland told New Tang Dynasty (NTD) News on Sunday that his team studied the data from the 2018 elections for 18 months and found significant mathematical evidence of corruption within the U.S. election system.

Ramsland told NTD News that he has collected hard evidence of voter fraud from an analysis of the 2018 election logs to the Nov. 3, 2020 election, and warned if action is not taken to address the corruption, America could end up like Venezuela.

“We just went through and we discovered all this about the election system. We have tried to get people in DC to pay attention. No, no, no, they didn’t want to hear about it.” He added, “I think if we don’t win this election, we may never be able to get rid of this totally corrupt voting system that we have. And if we don’t, we’re on our way to Venezuela.”


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11/23/2020 at 9:04 PM

“access to the adjudication system resides with the election authority using it”

election authority = corrupt officials controlling the vote

Dominion means “to control”. Not “to count”, **to control**.

What’s in a name?

Joe Biden: **“We have put together I think the most extensive and inclusive voter fraud organization in the history of American politics.”**

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What's in a name?

Joe Biden: **"We have put together I think the most extensive and inclusive voter fraud organization in the history of American politics."**

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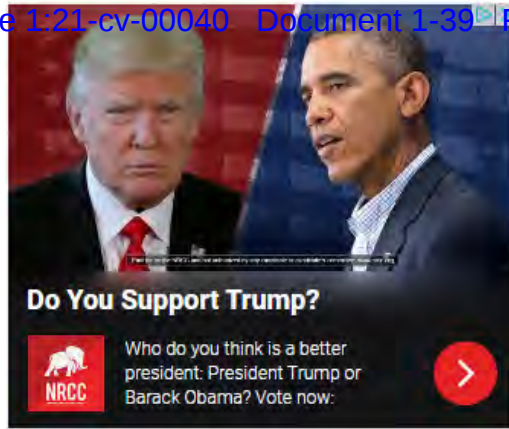
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President Trump and his legal team have been contesting the results of the Nov. 3 election, citing irregularities and voter fraud.



Former Texas Prosecutor [Sidney Powell](#) (The Epoch Times)

Attorney Sidney Powell has also alleged that Dominion software was used to switch votes in the voting machines.

Powell, in a statement, wrote, "The evidence I'm compiling is overwhelming that this software tool was used to shift millions of votes from President Trump and other Republican candidates to Biden and other Democrat candidates," she added. "We are proceeding to prepare our lawsuit and plan to file it this week. It will be epic."



Ramsland came to a similar conclusion, saying "There really is hard evidence. I mean, they really did use an algorithm, and it wasn't votes that were counted. It was a mathematical model, and allocated votes, and we can see the evidence because we see decimal places."

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"access to the adjudication system resides with the election authority using it"

election authority = corrupt officials controlling the vote

Dominion means "to control". Not "to count", **to control**.

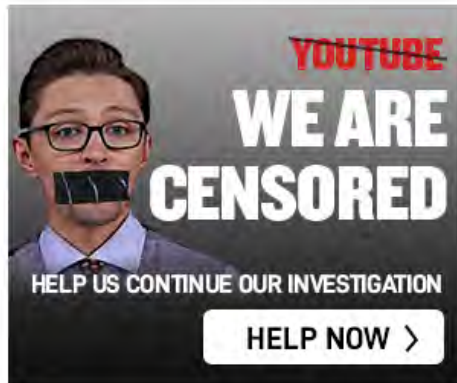
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really is hard evidence. I mean, they really did use an algorithm, and it wasn't votes that were counted. It was a mathematical model, and allocated votes, and we can see the evidence because we see decimal places."

The Epoch Times has not obtained such evidence and cannot independently verify this claim.



On Nov. 17, Ramsland told [Fox News](#), that his team has been studying the voting data from Michigan and have found that in four specific counties there were vote "spikes" in the voting data from Nov. 3, showing votes mainly for Biden.

"We've gone back and traced the spikes, we've seen where they were cast, primarily in four counties. We've looked at how long it took to cast those votes and we've looked at the equipment that exists and all those locations by serial number. And the fact of the matter is, we can't see any physical way possible for some of those votes to have been in those kinds of numbers because they just don't have the equipment to produce it."

Dominion, however, in several statements to The Epoch Times, has categorically denied allegations of election tampering and voter fraud, saying that Trump's team has peddled "falsehoods regarding Dominion" in recent press conferences and interviews.

"Dominion employees do not have access to the [canvass] adjudication system, nor do they operate it," the Toronto-based firm said in a statement. It added that "access to the adjudication system resides with the election authority using it" and that "the system is

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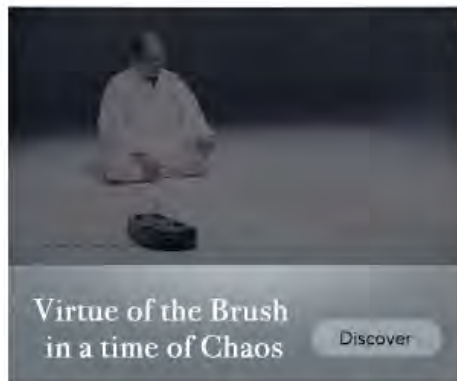
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However, Ramsland is convinced of corruption within the voting system and said this is not about Biden or Trump, but rather that this election is about "whether we the people are going to have an honest voting system."



Virtue of the Brush
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Exhibit 40

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FILE NAME: BREAKING NEWS Sidney Powell Tells Lou Dobbs
Her Lawsuit In Georgia May Be Filed As Soon As Tomorrow
(7:02 min)

TRANSCRIPT OF VIDEO-RECORDED INTERVIEW

SIDNEY POWELL

LOU DOBBS

Transcribed By:
TERRI NESTORE
CSR No. 5614, RPR, CRR

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1 LOU DOBBS: Joining us tonight by phone is Sidney
2 Powell, defense attorney for General Michael Flynn, former
3 federal prosecutor herself and a great American.

4 Sidney, great to have you with us. Let's start
5 with the ownership of these voting firms. I know you're
6 focusing on that part of the electoral fraud that's been
7 perpetrated this year in this election.

8 Why don't we know who they are?

9 SIDNEY POWELL: Well, because they've used
10 multiple shell companies and now apparently private equity
11 groups to hide their actual ownership, but there's no
12 doubt that the software was created and used in Venezuela
13 to control the elections and make sure that Hugo Chavez
14 was always reelected as the dictator of Venezuela in what
15 appeared to be, quote, free and fair elections, end quote,
16 but they were manipulated by the software used in the
17 Dominion machines -- and used by other machines in the
18 United States, frankly, and we are just continuing to be
19 inundated by evidence of all the frauds here, and every
20 manner and means of fraud you could possibly think of.

21 LOU DOBBS: Yeah. I think many Americans have
22 given no thought to electoral fraud that would be
23 perpetrated through electronic voting; that is, these
24 machines, these electronic voting companies, including
25 Dominion, prominently Dominion, at least in the suspicions

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1 of a lot of Americans. We don't even know who has
2 actually seen this software work. We don't know where
3 their servers are for sure. We know a couple of them are
4 overseas, and by "overseas" I mean in Germany and in
5 Spain.

6 It's just stunning that we have progressed this
7 far with these companies and have permitted these entities
8 that we don't know what their ownership is, we don't know
9 what their possible bias is. How could this be?

10 SIDNEY POWELL: Because of all the corruption in
11 the country. We need to find a way to follow the money
12 back as far even as when this was approved by the special
13 government committee called CFIUS, S-C -- C-F-I-U-S, which
14 are the heads of the respective agencies at the time who
15 approved Dominion coming into the country and running our
16 elections.

17 I mean Carolyn Maloney and Klobuchar and Warren
18 have been raising Cain about this issue for a long time,
19 but nobody's done anything about it.

20 LOU DOBBS: As recently as last year.

21 SIDNEY POWELL: Yeah. And as best I can tell,
22 both parties have any number of people who are at fault,
23 in the fact this has continued to play any role in our
24 elections whatsoever. And we have no idea of who all has
25 benefited from it. Somebody needs to do a massive money

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1 following investigation to find out who paid what to whom.

2 LOU DOBBS: Well, you have promised a -- a kraken
3 will be unleashed. We are -- we were expecting perhaps
4 your suit would be filed yesterday or today.

5 When shall we expect your lawsuit?

6 SIDNEY POWELL: Well, I think no later than
7 tomorrow. It's just going to be -- it's a massive
8 document and it's going to have a lot of exhibits.

9 LOU DOBBS: And who will be the defendant or
10 defendants?

11 SIDNEY POWELL: The defendants are going to be
12 folks in Georgia who are responsible for supposedly making
13 sure the elections in Georgia are done properly, and there
14 are just countless incidents of voter fraud and election
15 fraud, writ large, in Georgia.

16 LOU DOBBS: In Georgia. Are you planning any
17 other suits beyond Georgia?

18 SIDNEY POWELL: Yes, we are. We'll be rolling
19 them out as fast as we possibly can because it affected
20 the entire country, actually. We even have an affidavit
21 now from a distant state, that's done by one of the
22 election officials in the state, telling us all the things
23 that person witnessed as being wrong there.

24 So it was nationwide.

25 LOU DOBBS: Well, the number of affidavits is

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1 voluminous now. The eyewitnesses are considerable.

2 Your thoughts now about what will be the impact
3 and can it be adjudicated in such a way as to meet all of
4 the deadlines that are forced upon you; that is,
5 December 8th, December 14th? Give us your sense of the
6 timing and the urgency of getting this to resolution.

7 SIDNEY POWELL: Yes. Well, obviously it couldn't
8 be more urgent, but yes, the time deadlines should be able
9 to be met and the evidence is so overwhelming, it's almost
10 as though they were so blatant about it, they expected us
11 to catch it and, you know, maybe it's a diversion from
12 something else that's going on, I don't know.

13 But it's also clear that there was foreign
14 intrusion into our voting systems, and that's going to be
15 the real -- where the rubber meets the road.

16 LOU DOBBS: You know, a person that I hold in
17 high regard who's been at various points in this political
18 conflict over the last four years, said that the
19 difference this year in the political corruption and the
20 pervasive nature of it is that he believes the left
21 doesn't even care, the radical dems, the deep state don't
22 even care whether we find out what we know, and I thought
23 about it and, you know, I think he may be well -- that may
24 be well considered. Your thoughts?

25 SIDNEY POWELL: Yes, I agree. I mean, that's

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1 exactly how blatant it is, and all kinds of it are equally
2 blatant. I mean, people sitting on the floor and writing
3 on the side of buses, filling out ballot after ballot.
4 It's in your face, everywhere. The statistical evidence
5 is insurmountable. The mathematical evidence is to a
6 mathematical impossibilities.

7 There's no way there was anything but widespread
8 election fraud here. We've got one witness that says in
9 Arizona at least there were 35,000 votes added to every
10 democrat candidate just to start their voting off. It's
11 like getting your \$500 of Monopoly money to begin with
12 when you haven't done anything, and it was only for
13 democrats.

14 LOU DOBBS: Do you think that we're going to see
15 the Trump presidency saved?

16 SIDNEY POWELL: Yes, I definitely do.

17 There are -- there is no issue in my mind but
18 that he was elected in an absolute landslide nationwide.

19 LOU DOBBS: Sidney Powell, thanks for being with
20 us. We appreciate it. Thanks so much.

21 (End of recording.)
22
23
24
25

C E R T I F I C A T E

I, TERRI NESTORE, Certified Shorthand Reporter/
Transcriptionist, do hereby certify that I was authorized
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I further certify that I am not of counsel or
attorney for either or any of the parties to said
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parties thereto.

Dated this 17th day of December, 2020.



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Exhibit 41

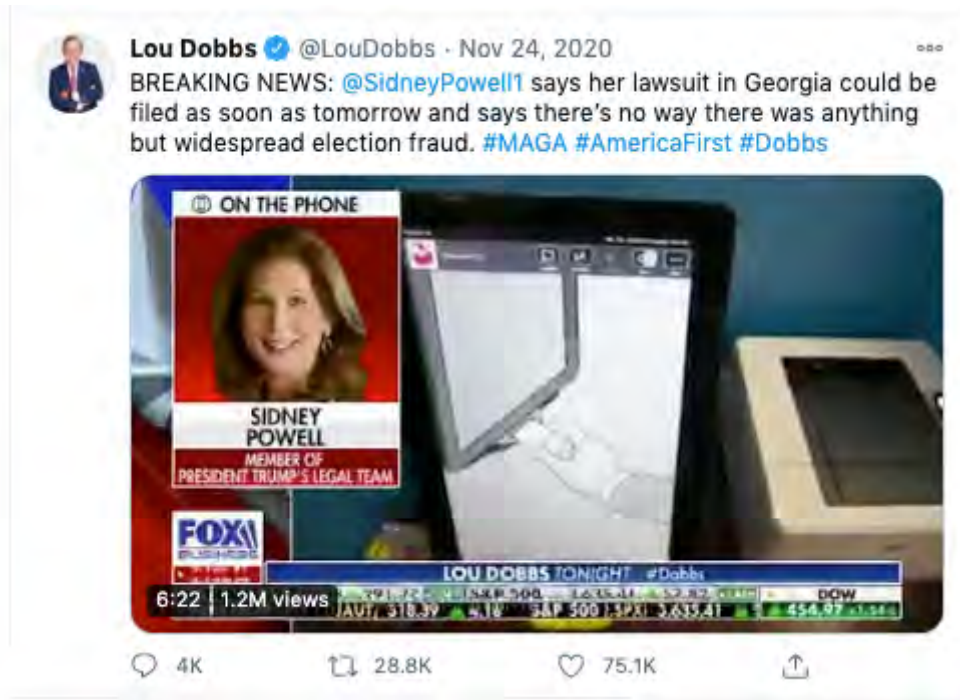


Exhibit 42

AG, SOS: Plaintiff's Report in Antrim County Election Lawsuit Demonstrates Lack of Credible Evidence in Widespread Fraud or Wrongdoing

Contact: Ryan Jarvi 517-599-2746
Agency: Attorney General

December 14, 2020

LANSING – Attorney General Dana Nessel and Secretary of State Jocelyn Benson, in an Antrim County court hearing today, did not object to the public release of a report on Dominion software from the partisan organization Allied Security Operations Group (ASOG), in order to demonstrate the “report” is actually another in a long stream of misguided, vague and dubious assertions designed to erode public confidence in the November presidential election.

"Let's be clear: Michigan's Nov. 3 general election was the most secure in our state's history," said Secretary Benson upon the release of the report. "There continues to be no evidence of widespread fraud, as affirmed by state and federal agencies including Attorney General William Barr, the Federal Bureau of Investigation, and the Cybersecurity and Infrastructure Security Agency. If the Trump campaign had any actual evidence of wrongdoing – or genuine suspicion thereof – they could have requested a hand recount of every ballot in the state. They did not, instead choosing to allow shadowy organizations claiming expertise to throw around baseless claims of fraud in an effort to mislead American voters and undermine the integrity of the election. Their actions are a corruption of the courts and the rule of law, as the release of today's report clearly demonstrates."

A lawsuit filed in 13th Circuit Court, *Bailey v Antrim County*, seeks to challenge Antrim County's election results, posing **false claims of fraud** and accompanied with a report filled with errors and clear bias.

"Oftentimes, a party will hire an expert witness to support the conclusion that the party wants or needs to reach. It's why we give the other parties in a lawsuit a chance to depose the expert and challenge their qualifications in court," Attorney General Nessel said. "Anyone can have an opinion, but it doesn't necessarily mean the opinion is based on fact or science."

ASOG authored the “preliminary forensic audit,” which was made public by the judge today. The group, however, has no apparent expertise in election administration and technology. Their work is limited to the previous release and amplification of other false information and fake documents. **As expected**, the plaintiff’s most recent report on Antrim County is similarly critically flawed, filled with dramatic conclusions without any evidence to support them.

Today's activity comes on the heels of last week's announcement from the Department of State that the Bureau of Elections is planning the most comprehensive set of election audits in the state's history. This will include a statewide risk-limiting audit, several local procedural audits, and a zero-margin risk-limiting-audit of all ballots in Antrim County. The latter, which will be conducted on Thursday, Dec. 17, is expected to confirm that votes cast for president were machine-tabulated correctly. A similar statewide risk-limiting audit demonstrated the accuracy of the state's voting machines following the March 10 presidential primary.

In response to a previously unsigned version of the ASOG report, Michigan Bureau of Elections Director Jonathan Brater made a [preliminary declaration](#) under oath for the court. In his statement, Brater said it was apparent to him "... that the report makes a series of unsupported conclusions, ascribes motives of fraud and obfuscation to processes that are easily explained as routine election procedures or error corrections, and suggests without explanation that elements of election software not used in Michigan are somehow responsible for tabulation or reporting."

There are several legal concerns with the report and testimony submitted in *Bailey v Antrim County*, including the portions provided by Russell Ramsland, one of the “expert” witnesses in the case.

A [Detroit Free Press](#) story from Nov. 21 quotes Rudy Giuliani as saying Michigan has “over-votes in numerous precincts of 150%, 200% and 300%.” Giuliani’s source was an affidavit from Ramsland, who is a former Republican congressional candidate. All 19 of the precincts cited in his affidavit are in Minnesota, not Michigan. Ramsland has also [inaccurately stated the voter turnout rate in Detroit](#), saying it was nearly three times higher than it actually was.

The qualifications of those who authored the report are suspect, with no evidence or credentials provided to back up their “expertise.” Authors in the report also make unverified and unsupported claims that “fraud,” “intentional errors” and “bad faith” decisions made by election officials led them to their conclusions in the report. Moreover, many of their assertions are unsupported by evidence, with some even constituting hearsay and clearly show that the authors lack first-hand knowledge of events.

Michigan Rule of Evidence 702 states that if the court determines that scientific, technical, or other specialized knowledge will assist the trier of fact to understand the evidence or to determine a fact in issue, a witness qualified as an expert by knowledge, skill, experience, training, or education may testify thereto in the form of an opinion or otherwise if (1) the testimony is based on sufficient facts or data, (2) the testimony is the product of reliable principles and methods, and (3) the witness has applied the principles and methods reliably to the facts of the case. That has not happened in this case yet.

Past court rulings have found that the trial court has a fundamental duty to ensure that all expert testimony is reliable (*Gilbert v DaimlerChrysler Corp.*), and that the knowledge of the testimony must be more than "subjective belief or unsupported speculation" (*Daubert v Merrell Dow Pharmaceuticals*). At the conclusion of discovery, the Department of Attorney General will have the opportunity to request that the plaintiff's report be stricken from use in these proceedings.

The public will be able to view the Department of State's official audit of the Antrim County presidential election. Details will be announced prior to the audit's commencement on Thursday, Dec. 17.

[Click here to view a copy of Brater's declaration.](#)

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###



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Exhibit 43

Disputing Trump, Barr says no widespread election fraud

By MICHAEL BALSAMO December 1, 2020



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WASHINGTON (AP) — Disputing President Donald Trump's persistent, baseless claims, Attorney General William Barr declared Tuesday the U.S. Justice Department has uncovered no evidence of widespread voter fraud that could change the outcome of the 2020 election.

Barr's comments, in an interview with the The Associated Press, contradict the concerted effort by Trump, his boss, to subvert the results of last month's voting and block President-elect Joe Biden from taking his place in the White House.

Barr told the AP that U.S. attorneys and FBI agents have been working to follow up specific complaints and information that's



outcome of the 2020 election.

Barr's comments, in an interview with the The Associated Press, contradict the concerted effort by Trump, his boss, to subvert the results of last month's voting and block President-elect Joe Biden from taking his place in the White House.

Barr told the AP that U.S. attorneys and FBI agents have been working to follow up specific complaints and information they've received, but "to date, we have not seen fraud on a scale that could have effected a different outcome in the election."

The comments, which drew immediate criticism from Trump attorneys, were especially notable coming from Barr, who has been one of the president's most ardent allies. Before the election, he had repeatedly raised the notion that mail-in voting could be especially vulnerable to fraud during the coronavirus pandemic as Americans feared going to polls and instead chose to vote by mail.

More to Trump's liking, Barr revealed in the AP interview that in October he had appointed U.S. Attorney John Durham as a special counsel, giving the prosecutor the authority to continue to investigate the origins of the Trump-Russia probe after Biden takes over and making it difficult to fire him. Biden hasn't said what he might do with the investigation, and his transition team didn't comment Tuesday.

Trump has long railed against the investigation into whether his 2016 campaign was coordinating with Russia, but he and Republican allies had hoped the results would be delivered before the 2020 election and would help sway voters. So far, there has been only one criminal case, a guilty plea from a former FBI lawyer to a single false statement charge.

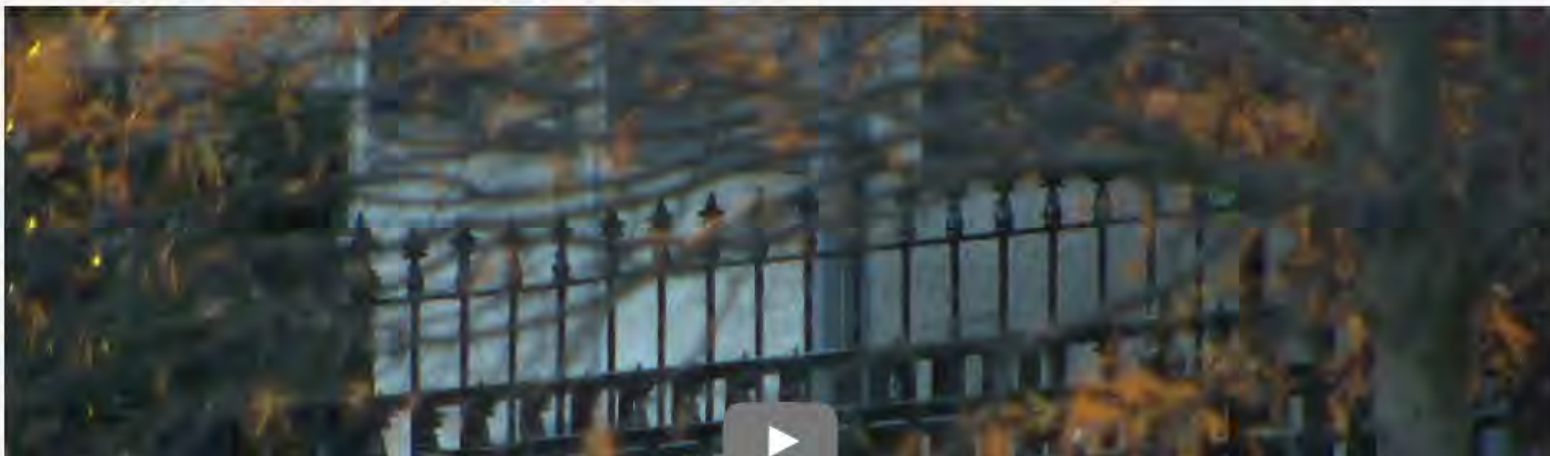
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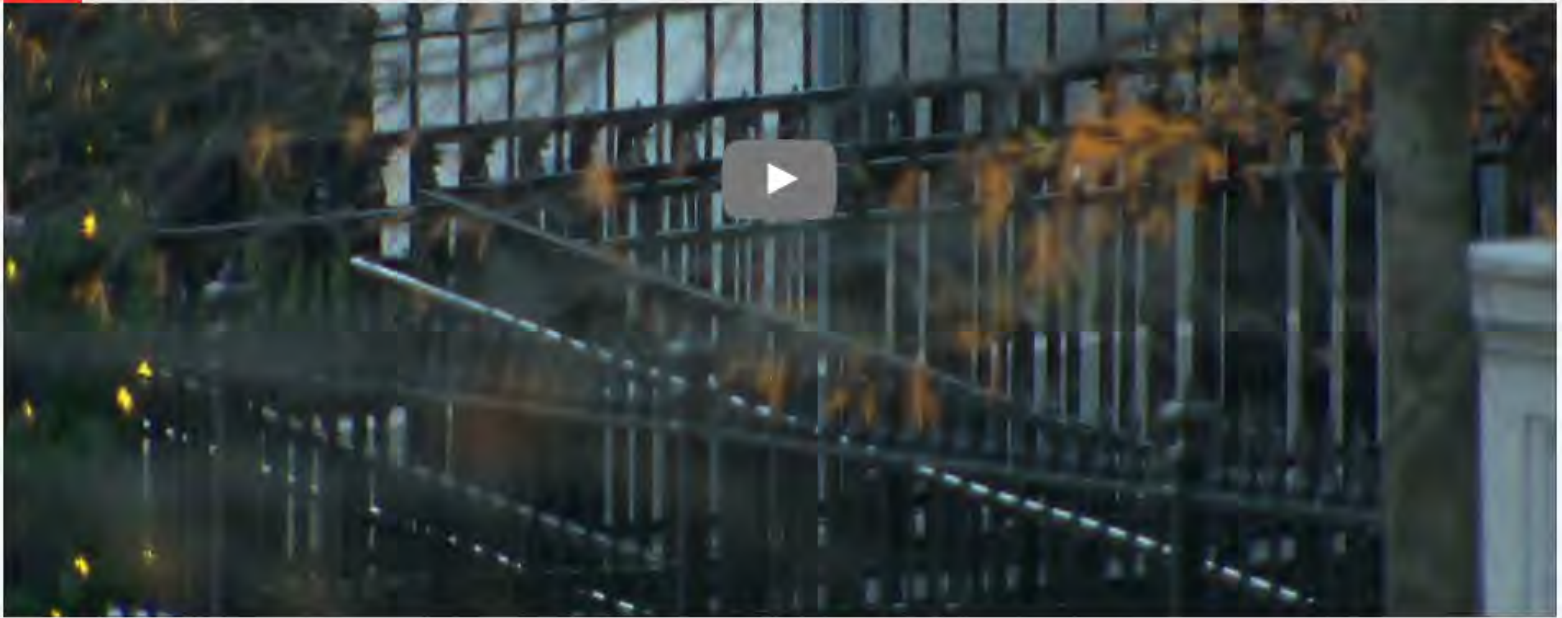
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Under federal regulations, a special counsel can be fired only by the attorney general and for specific reasons such as misconduct, dereliction of duty or conflict of interest. An attorney general must document such reasons in writing.

Barr went to the White House Tuesday for a previously scheduled meeting that lasted about three hours.

Trump didn't directly comment on the attorney general's remarks on the election. But his personal attorney Rudy Giuliani and his political campaign issued a scathing statement claiming that, "with all due respect to the Attorney General, there hasn't been any semblance" of an investigation into the president's complaints.





Attorney General William Barr said Tuesday the Justice Department has not uncovered evidence of widespread voter fraud that would change the outcome of the 2020 presidential election. (Dec. 1)

Other administration officials who have come out forcefully against Trump's allegations of voter-fraud evidence have been fired. But it's not clear whether Barr might suffer the same fate. He maintains a lofty position with Trump, and despite their differences the two see eye-to-eye on quite a lot.

Still, Senate Democratic leader Chuck Schumer quipped: "I guess he's the next one to be fired."

Last month, Barr issued a directive to U.S. attorneys across the country allowing them to pursue any "substantial allegations" of voting irregularities before the 2020 presidential election was certified, despite no evidence at that time of widespread fraud.

That memorandum gave prosecutors the ability to go around longstanding Justice Department policy that normally would prohibit such overt actions before the election was certified. Soon after it was issued, the department's top elections crime official announced he would step aside from that position because of the memo.

The Trump campaign team led by Giuliani has been alleging a widespread conspiracy by Democrats to dump millions of illegal votes into the system with no evidence. They have filed multiple lawsuits in battleground states alleging that partisan poll watchers didn't have a clear enough view at polling sites in some locations and therefore something illegal must have happened. The claims have been repeatedly dismissed including by Republican judges who have ruled the suits lacked evidence.

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But local Republicans in some battleground states have followed Trump in making unsupported claims, [prompting grave concerns](#) over potential damage to American democracy.

Trump himself continues to rail against the election in tweets and in interviews though his own administration has said the [2020 election was the most secure ever](#). He recently allowed his administration to begin the transition over to Biden, but he still refuses to admit he lost.

The issues they've have pointed to are typical in every election: Problems with signatures, secrecy envelopes and postal marks on mail-in ballots, as well as the potential for a small number of ballots miscast or lost.

But they've gone further. Attorney Sidney Powell [has spun](#) fictional tales of election systems flipping votes, German servers storing U.S. voting information and election software created in Venezuela "at the direction of Hugo Chavez," – the late Venezuelan president who died in 2013. Powell has since been removed from the legal team after an interview she gave where she threatened to "blow up" Georgia with a "biblical" court filing.

Barr didn't name Powell specifically but said: "There's been one assertion that would be systemic fraud and that would be the claim that machines were programmed essentially to skew the election results. And the DHS and DOJ have looked into that, and so far, we haven't seen anything to substantiate that."

In the campaign statement, Giuliani claimed there was "ample evidence of illegal voting in at least six states, which they have not examined."

Full Coverage: Election 2020

"We have many witnesses swearing under oath they saw crimes being committed in connection with voter fraud. As far as we know, not a single one has been interviewed by the DOJ. The Justice Department also hasn't audited any voting machines or used their subpoena powers to determine the truth," he said.

However, Barr said earlier that people were confusing the use of the federal criminal justice system with allegations that should be made in civil lawsuits. He said a remedy for many complaints would be a top-down audit by state or local officials, not the U.S. Justice Department.

"There's a growing tendency to use the criminal justice system as sort of a default fix-all," he said, but first there must be a basis to believe there is a crime to investigate.

"Most claims of fraud are very particularized to a particular set of circumstances or actors or conduct. ... And those have been run down; they are being run down," Barr said. "Some have been broad and potentially cover a few thousand votes. They have been followed up on."



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Associated Press Writers Lisa Mascaro and Eric Tucker contributed to this report.

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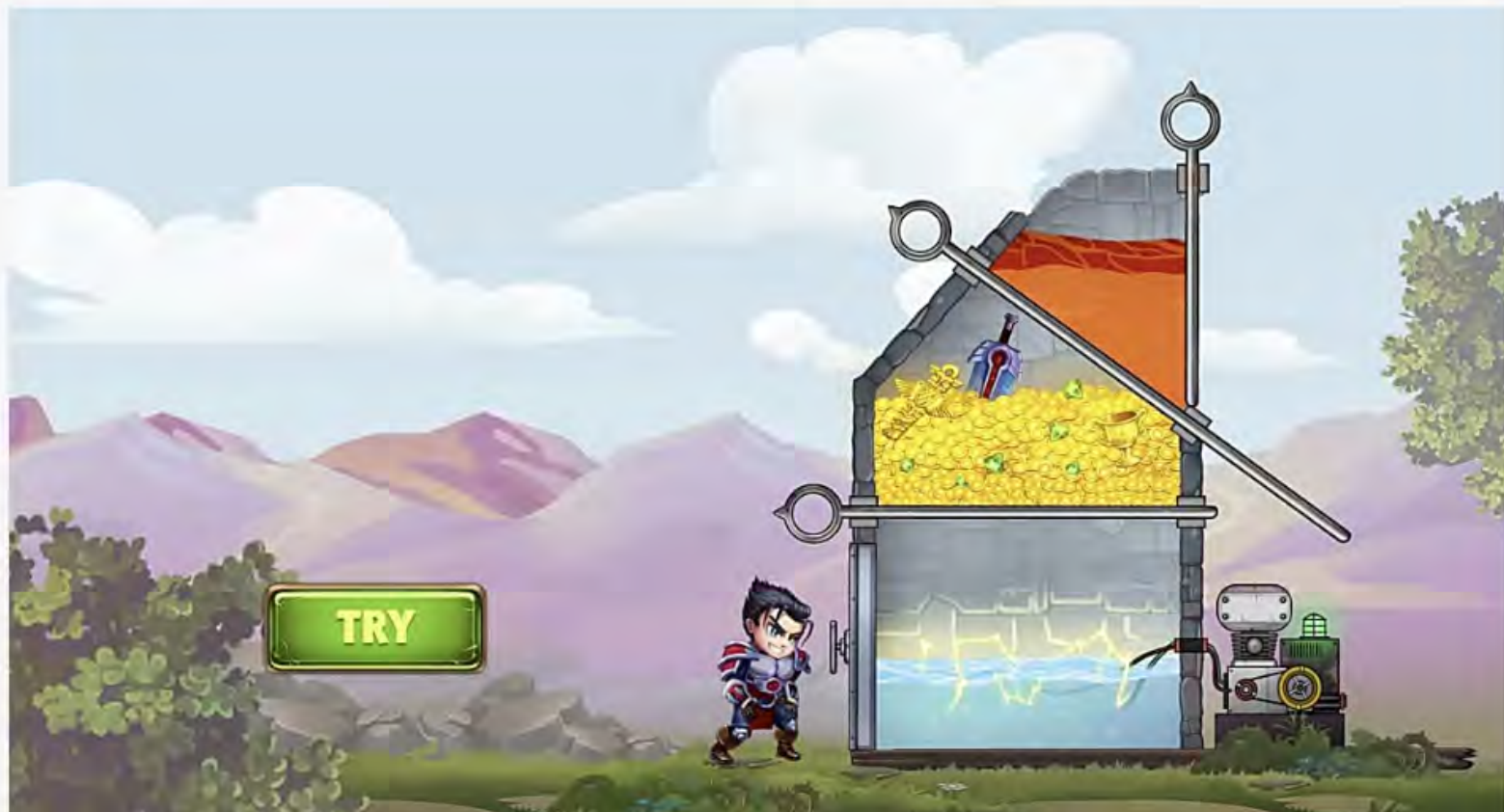
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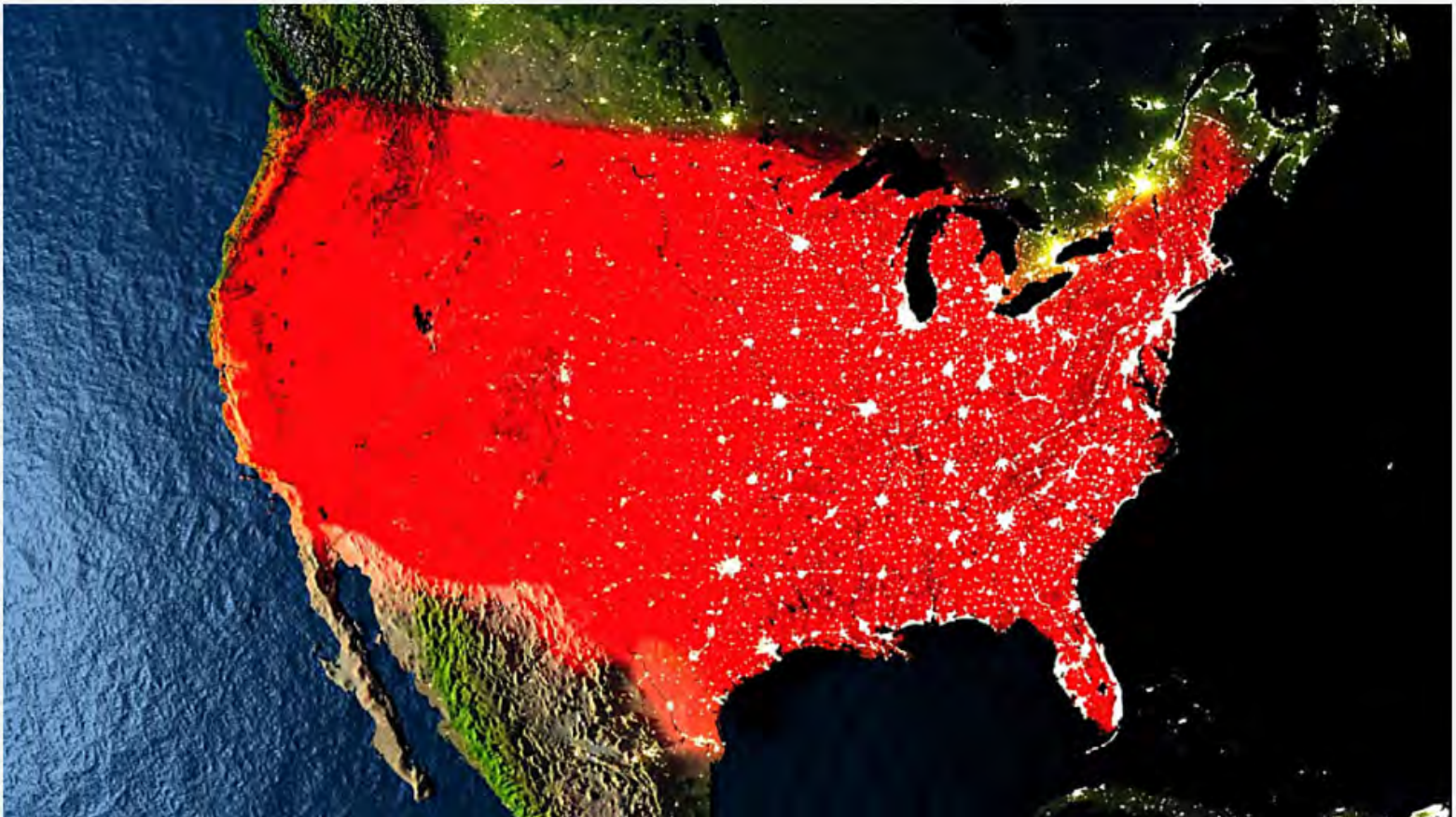
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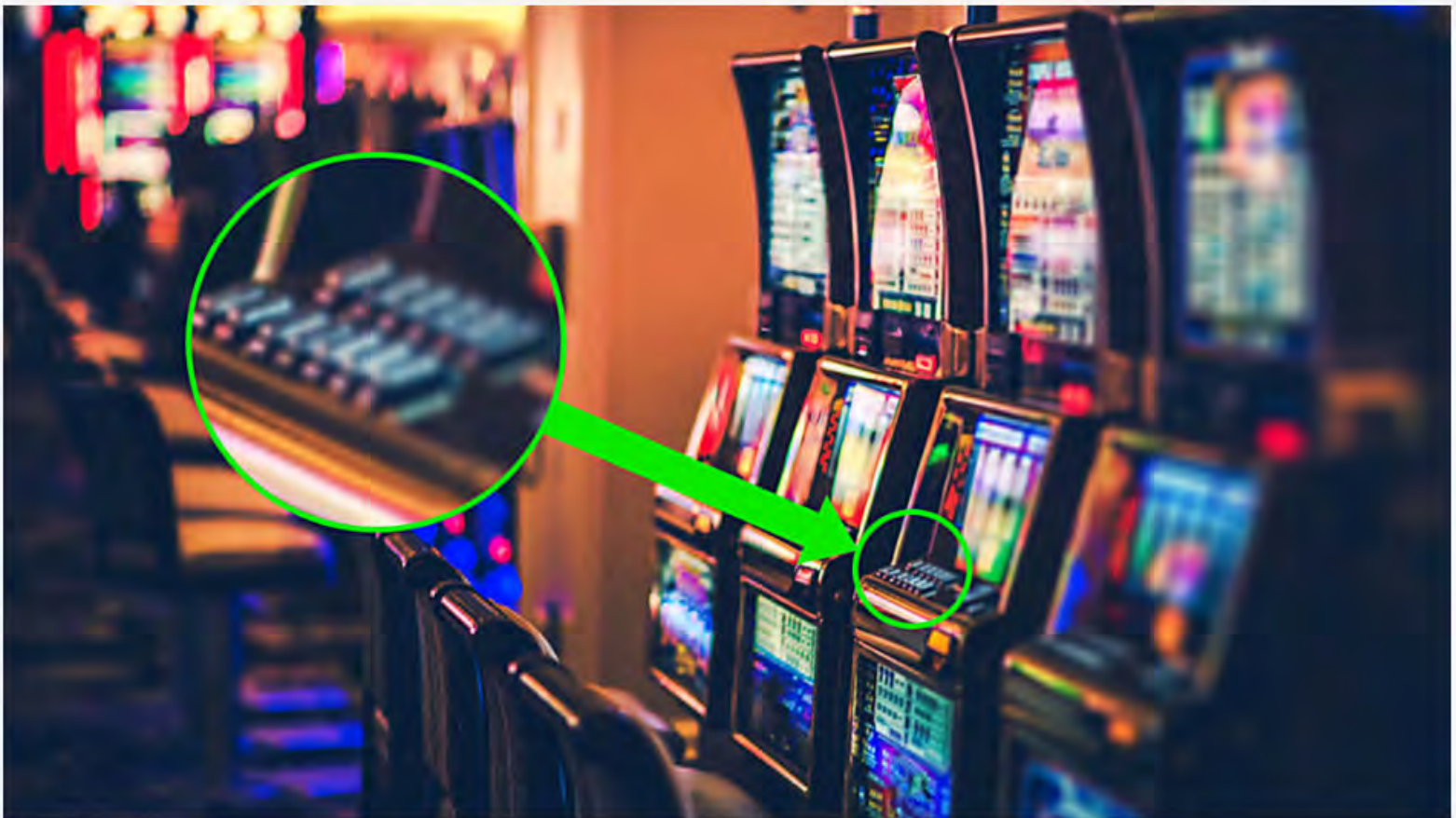
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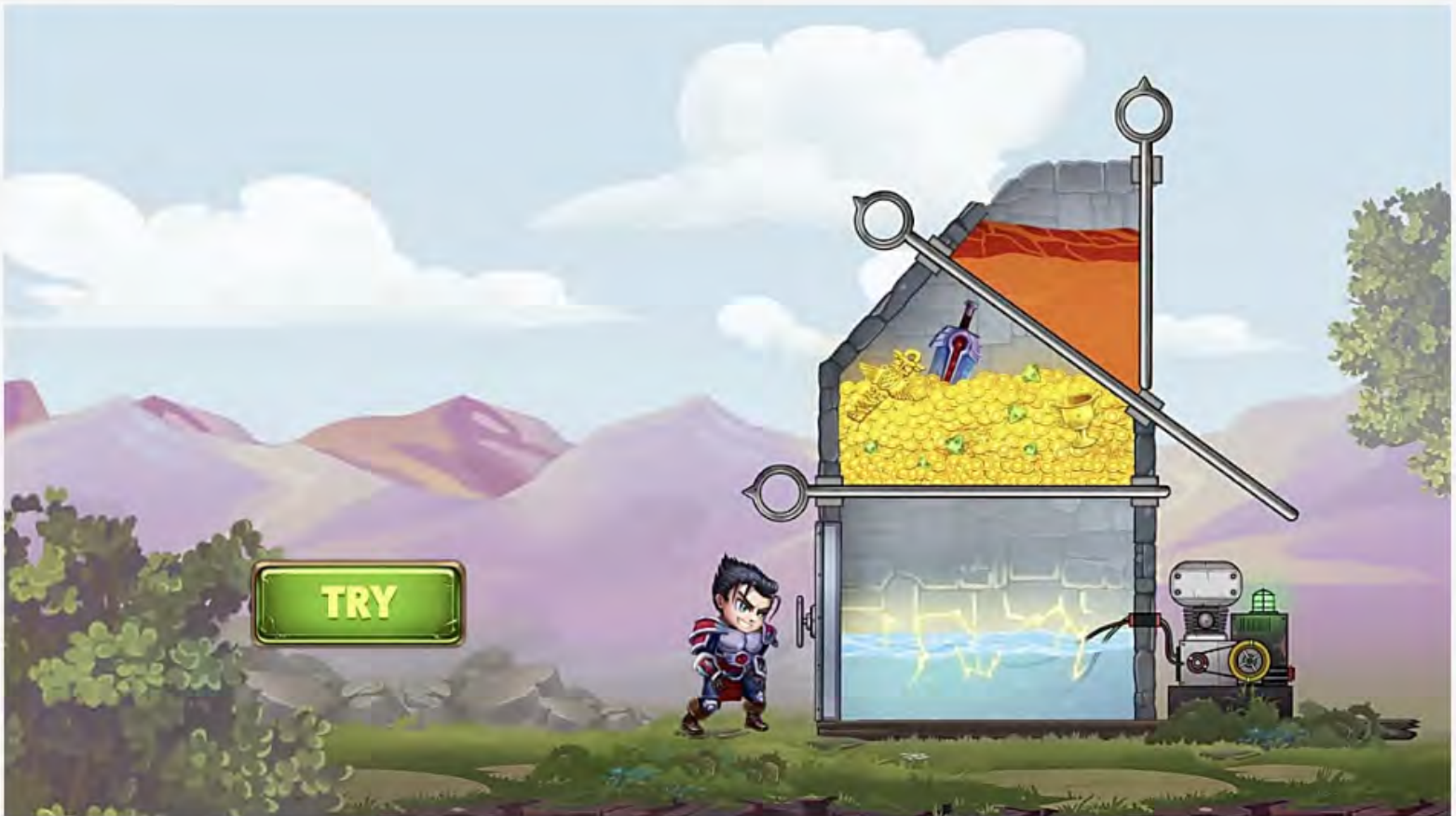
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FILE NAME:

Sidney Powell, Lin Wood attend Stop the Steal
Rally in Georgia (Dec. 2)
(1:56:20 Hour)

TRANSCRIPT OF VIDEO-RECORDED RALLY

Transcribed By:
TERRI NESTORE
CSR No. 5614, RPR, CRR

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1 LIN WOOD: Thank you. I want to thank everyone
2 here because I know you're here because you love America.
3 I know you're here because you love Donald Trump and he
4 loves you. You're here because we the people will not let
5 them steal our vote. We will not let them steal our
6 freedom. Every lie will be revealed and on January the
7 20th of 2021, Donald J. Trump will be sworn in as
8 president of the United States of America.

9 I'd like for you to bow your heads for a moment
10 of prayer.

11 (Prayer.)

12 LIN WOOD: I want to introduce the man that had
13 the courage to represent me when I filed a lawsuit now
14 pending in the Eleventh Circuit. He's also representing
15 the president of the United States in a lawsuit to be
16 filed in Georgia. Ray Smith. Come up, Ray.

17 Couple of other great Americans been fighting for
18 a long time, CJ Pearson, Ali Alexander. Come on up here.
19 You've got to like the name Ali. Needs no introduction.
20 The one, the only, the kraken, Sidney Powell. Where's our
21 man? Where's our man? Vernon Jones, where are you,
22 Vernon? Another great American, Vernon Jones.

23 Thank you, Vernon.

24 There's another man, I know where he is but he's
25 not here, he's not in the Whitehouse, he's not the

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1 president of the United States, but I know this man and I
2 know what he's doing right now. I know what he's been
3 doing for many, many years. He's been fighting for
4 America and he's been fighting for you the people for the
5 last several years. He's been fighting the same people
6 that persecuted him for years and falsely accused him for
7 years. They're trying to steal our country from us.

8 Give it up for General Michael Flynn.

9 And I promise this to the general, who will be
10 our general George Washington, I promise this and I know
11 you, the people, will join me in promising, we're going to
12 fight like a Flynn. Fight like a Flynn.

13 And when we do, and we will, we'll fight like a
14 Flynn and we're going to make America great again.

15 We're going to send a message. We're going to
16 send a message from Wills Park in Alpharetta, Georgia, to
17 the State Capitol and the golden dome of Georgia, to the
18 tin roof of the governor's mansion of Georgia, we're going
19 to send 'em a message, and the message is this: It's 1776
20 in America again, and you're not going to take our
21 freedom. We're going to fight for our liberty, we're
22 going to send that message from Wills Park today and we're
23 going to send it all the way over to Beijing, China.
24 We're not going to let you take our country over. Never
25 going to happen on our watch. This is America. You

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1 picked a fight with the wrong people.

2 We're going to send that message -- we're going
3 to send that message to George Soros. Get out of our
4 country, George Soros. We are not going to allow
5 ourselves to go back into the polling booth -- and you
6 hear us out, Governor Kemp -- you hear me while you hide
7 in your closet and you hear us, you hear the people, Brad
8 Raffensperger, and I want Lieutenant Governor Geoffrey
9 Duncan to hear it too and the guy that's making a ton of
10 money, Gabriel Sterling, you listen up, Gabriel. You're
11 not going to sell our votes to China. We're not going to
12 vote on your damn machines made in China. We're going to
13 vote on machines made in the USA.

14 I'll tell you what, I believe that a great man
15 one time called upon the black Americans to take actions.
16 We're not here for violence. But Martin Luther King, Jr.
17 believed in nonviolent civil disobedience, civil
18 disobedience. I want you to go to the governor's mansion,
19 I want you to circle it, I want you to blow your horns
20 until Brian Kemp comes out and orders a special session of
21 the Georgia legislature. Get us our legislature and tell
22 everybody we want our legislature to meet and we want them
23 to fix the mess that he created and then he can resign.

24 And then as far as I'm concerned, lock him up.

25 There's a few others that need to go with him.

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1 Now, everybody's been reading the media. Stop.
2 It's a lie. Stick with OAN and Newsmax. They tell you
3 the truth. Read The Epoch Times, they tell you the truth.

4 This is the battle between good and evil. This
5 is the battle between truth and lies.

6 I'm going to introduce now a person that's going
7 to tell you the truth. They want to know, where's your
8 evidence? Show us your evidence. Oh, we're going to show
9 'em the evidence. There's piles of evidence. There's
10 mountains of evidence. This election was a fraud on
11 America. Donald Trump won a massive landslide victory,
12 unparalleled in the history of this country, and he's
13 going to stay in the Whitehouse because we the people
14 voted for him and we the people run this country.

15 This country belongs to you and you and you and
16 you. It belongs to the people.

17 I challenge... I challenge Governor Kemp to step
18 up in front of the people, put his hand on this Bible and
19 tell us that he did not take money from China. He did.
20 So did Brad Raffensperger. They won't put their hand on
21 this Bible and swear to the contrary because if they do,
22 they will commit perjury, and there's another reason to
23 lock 'em up.

24 The person that's leading the charge, I've been
25 with her when she's worked 23 hours a day. I've seen the

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1 young people fighting for America under her charge and
2 leadership, and let me tell you, you can call her the
3 kraken, but she's Sidney Powell. Come on up here, Sidney.

4 SIDNEY POWELL: Thank you. Thank you all. Thank
5 you all so much. (Blank spot in audio) that makes (blank
6 spot in audio). We feel your prayers. I feel your
7 prayers. General Flynn and I, throughout the ordeal we
8 have been through, have felt the prayers of you and
9 millions of people all across the country, and frankly,
10 from around the world, who have helped us face everything
11 we have faced and have the strength to proceed every day
12 to keep fighting for the truth.

13 Americans around the world and freedom loving
14 people around the world are starved for the truth and for
15 freedom. That is exactly what they have all tried to take
16 away from all of us. It's been increasing exponentially
17 for the last 20 years.

18 It's unbelievable to me, as a child of the 50's
19 that grew up in just an amazing time in this country, when
20 you could walk to school safely and have friends of all
21 kinds and there was none of the divisiveness, at least in
22 my life and in the lives of my friends, regardless of
23 their color, that we see now.

24 In the world of real Americans we are not defined
25 by who we look like, what we look like, what color we are

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1 or anything else. We're defined by our love for freedom
2 and liberty and justice for all, on which this
3 extraordinary nation was founded.

4 Those are the values, American values, God,
5 family, country, are the values we must return to now.

6 We will not allow ourselves to continue to be
7 influenced by flat-out communism, socialism, any of the
8 dark forces that have come to impose their will on so many
9 of us. Now is the time for every patriot in this country
10 to stand up, make their voices heard, and be counted.
11 Every person serving in any public office, whether it be
12 local, county, state or federal, works for you. You pay
13 them and you're supposed to be able to elect them with
14 your lawful and rightful votes.

15 There was and is still massive voter fraud across
16 this country. It took all forms, it was not just the
17 Dominion machines. We have experts and a witness who have
18 explained to us that the fraud exists in the DNA of all
19 the software that was run by any voting system in the
20 country, so they all are at risk of having been
21 manipulated. I think we will eventually find that the
22 algorithm that flipped votes at a certain percentage from
23 Trump to Mr. Biden was run all across the country. There
24 might be a few areas that it wasn't used in, but not many.

25 And then we have the extraordinary evidence of

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1 inexplicable spikes, I mean hundreds of thousands of
2 spikes in votes. We can see them injected into the
3 system, sometimes at a rate of 90 percent for Biden and
4 ten percent for Trump.

5 We all know that defies reality. You can't flip
6 a coin 300,000 times and have it always land on heads.

7 There are lots of people that got cheated and it
8 went -- even local races. Yep, yep, yep. Lots of
9 Congressional seats, Senate seats. I agree, there should
10 not be a runoff, certainly not on Dominion machines.

11 I think I would encourage all Georgians to make
12 it known that you will not vote at all until your vote is
13 secure, and I mean that regardless of party. We can't
14 live in a republic, a free republic, unless we know our
15 votes are legal and secure, so we must have voter ID and
16 we probably must go back to paper ballots that are signed
17 and have your thumbprint on them.

18 And we certainly should be able to find a system
19 that can count them, even if it has to be done by hand.

20 What we have experienced the last four years,
21 both with respect to General Flynn and President Trump, is
22 unacceptable in the United States of America. We expect
23 that in Venezuela, unfortunately where the Dominion
24 Systems and Smartmatic technology first took root and was
25 used to ensure the election of Hugo Chavez, the brutal

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1 dictator.

2 I'm still wondering what role our three letter
3 agencies had in the creation and distribution of that.

4 I knew the swamp was really bad but it's at least
5 20 percent worse than I thought it was. There is a whole
6 lot of draining that's going to have to be done. And
7 that's why they have fought so hard to get rid of
8 President Trump and tried every dirty, nasty, evil,
9 illegal trick in the book to do it. Yep, it is pure evil.

10 We've already traced a lot of the money that did
11 this back to China. We have internet white hat hackers, I
12 think they call them, who saw backdoors open in the system
13 and saw people in Iran and China and Hong Kong and Serbia
14 and I don't know how many countries having influence in
15 our election system. All of this must come to a
16 screeching halt right now.

17 You and your children and your grandchildren and
18 their children deserve the very best America has to offer.

19 The only thing that really distinguishes us from
20 other countries is our love of freedom and the application
21 of the rule of law. It hasn't been applied fairly or
22 equally in probably two decades.

23 We must demand that that change right now.

24 We will give all our evidence to the Department
25 of Justice as soon as we get it pulled together. I know.

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1 I wish I could say I didn't have concerns about how that
2 would be handled but unfortunately, I still do. It's
3 going to take a lot of indictments, and fast, to show us
4 that they really mean business, because there has been
5 flagrant election fraud.

6 We have evidence of everything from people buying
7 votes with checks written from a business on K Street in
8 D.C., to ballots being shredded, ballots being
9 manufactured, ballots coming across the border from Mexico
10 that are counterfeit, a plane full of ballots that came
11 in, ballots distributed across state lines after being
12 faked -- I mean there is no kind of voter fraud that
13 hasn't been experienced this year across the country.

14 Yeah, Georgia was absolutely full of it.

15 Rife with voter fraud.

16 But so are other states, including North Carolina
17 and Virginia. Pennsylvania went solid for Trump. Yet
18 they're still -- yep. So we need to flood the legislators
19 here in Georgia and the governor and the Secretary of
20 State with phone calls and letters. Yeah, I know. I
21 know. I know, everybody feels like they're not being
22 listened to, and that's just not right.

23 This is your state and your country and they need
24 to remember they work for you.

25 I just want to thank you all so much for caring

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1 enough to be here today. It is my honor and I know Lin
2 feels like it's his honor and so does the rest of our
3 significant team who have been working day and night since
4 the election, none of whom have been paid a dime yet,
5 although we do -- people have been contributing generously
6 to defendingtherepublic.org but we haven't even had time
7 to get the stuff set up to write a check to pay anybody
8 with yet. We're too busy fighting the fight but -- yep.

9 Thank you. I know you have my six and we all
10 really appreciate that. Once again, you inspire us.

11 God bless you and God bless America.

12 LIN WOOD: God bless you, Sidney Powell. God
13 bless you. God bless all the people here. Danny
14 Hamilton, I want to thank Danny Hamilton.

15 He drives our Trump bus. Thank you, Danny.

16 Read the United States Constitution and here's
17 what it makes clear: All the power -- not some of the
18 power -- all of the power belongs to the people. This is
19 our country. We tell government what they can and cannot
20 do. They cannot control the people. This is our country.
21 We're going to take it back. We're circling the walls of
22 Jericho. People are praying in this country. We are
23 circling the walls of Jericho, and God almighty is going
24 to tear the walls down and we're going to take America
25 back again. You watch it happen. You watch it happen.

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1 You send that message to Bill Barr at the Justice
2 Department, do your job. You work for us, Attorney
3 General Barr. Do your job. You tell the director of the
4 FBI, do your damn job. You work for us. Investigate this
5 fraud. And tell the director of the Central Intelligence
6 Agency, get out of our country. You don't spy on
7 Americans. You're not ever going to do it again in
8 America.

9 Thank God for Donald Trump. God almighty created
10 every one of us, and he created Donald Trump and he gave
11 him a task to fulfill in his life and that was to be
12 president of the United States in 2020 and he's going to
13 be president of the United States for four more years.

14 Watch it happen. The people will not allow it to
15 be taken away from them and neither -- and neither will
16 almighty God. God's going to save this country and he's
17 going to use every one of you to do it. He's going to
18 fill you with the spirit of King David, the warrior.

19 We are the rock. The people are the rock and
20 we're going to slay Goliath, the Communist, the liberals,
21 the phonies, Joe Biden will never set foot in the oval
22 office of this country. It will not happen on our watch.

23 Never going to happen.

24 Come on up here, Vernon Jones, a great American.

25 Vernon, come on up here. God bless Vernon Jones.

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1 Bring it up, Vernon. Yeah, baby.

2 VERNON JONES: Hello, America. Hello, Georgia.
3 Are you fired up? I am too. This is a hell of a day. I
4 need someone to help me just for a minute. I see Daniel
5 Boone, Junior in the house. Come on up here and hold my
6 flag. He has a Daniel Boone hat on. I want him to come
7 on up. He's a little shy. Daniel Boone.

8 You know about Daniel Boone.

9 I love this country and I love Georgia. I'm
10 Vernon Jones, I'm a member of the Georgia House of
11 Representatives and I took a oath to serve and protect not
12 only the Constitution, but the people of the state of
13 Georgia, and I'm not backing down. I'm here as an elected
14 official. It's my obligation and my duty to get your
15 questions answered. I am too in support and calling for a
16 special session in the Georgia general assembly.

17 This is not a third world country, this is the
18 United States of America and I'm not just doing it for
19 republicans, I'm doing it for democrats, I'm doing it for
20 every single person who lives in the state of Georgia.

21 This is not partisan. We are America and you
22 deserve and you elect 180 members of the house and you
23 elect another 56 state senators. We should -- the
24 Constitution gave us the authority to set all the rules
25 and regulations, as relates to state law, for elections,

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1 not the Secretary of State. We should have that oversight
2 and that's why we need to have a special session, so we
3 can look at what Raffensperger did in his agreements, what
4 Stacey Abrams and that crowd, which is not a fair fight,
5 that's a unfair fight.

6 We are standing up not only for black voters, but
7 white voters and democrat voters and republican voters and
8 libertarians. We're standing up for everybody. They all
9 should be on this stage. They all should be on this
10 stage.

11 And I'm like you. I don't want to see my country
12 go any further left. As a matter of fact, let's put it in
13 reverse and back it up. That's why I'm supporting Senator
14 David Perdue and Senator Kelly Loeffler, and I tell you
15 why: Someone talked about staying home. I think about
16 Dr. King, I think about all those folks who fought in the
17 movement. They were kicked and they were beat and some of
18 them were even killed just to be able to go and vote.

19 Dr. King was standing up for you then too. It's
20 your country. You hired a politician, they don't hire
21 you. You have to come out and I'm going to tell you why.
22 Georgia has a history of going into battle. Georgia has a
23 history of fighting. We are going to take this back to
24 George Washington, General Patten. We are going to fight
25 for this country and we're going to hold the line like

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1 America's held the line in every war we've ever been in.

2 Georgia is a battleground state. It's Georgia.

3 Hold the line. Hold the line. Hold the line. Hold the

4 line. Hold the line. Peace out, America.

5 LIN WOOD: Vernon Jones. Now, I love Vernon

6 Jones. Vernon Jones and I are more alike than we are

7 different, but I'm going to disagree with Vernon Jones.

8 Where's Kelly Loeffler here? Where is David

9 Perdue? He ought to be standing right here. Those two

10 people want your vote, then they ought to tell you what

11 we're telling Brian Kemp: Get a special session of the

12 legislature now. Do not be fooled twice. This is

13 Georgia. We ain't dumb. We're not going to go vote on

14 January 5th in another machine made by China. You're not

15 going to fool Georgians again. If Kelly Loeffler wants

16 your vote, if David Perdue wants your vote, they've got to

17 earn it. They've got to demand publicly, repeatedly,

18 consistently, Brian Kemp, call a special session of the

19 Georgia legislature, and if they do not do it, if Kelly

20 Loeffler and David Perdue do not do it, they have not

21 earned your vote. Don't you give it to them.

22 Why would you go back and vote in another rigged

23 election? For God's sake, fix it. You've got to fix it

24 before we'll do it again. They've already got 800,000

25 absentee ballots. They're printing them out over there in

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1 China, sending them over here, stamping them with a
2 computer, signing the names. They stole this election
3 from Doug Collins. Doug needs to stand up and fight too.

4 There needs to be the electors chosen from the
5 state of Georgia at a special session of the legislature
6 to vote for Donald J. Trump. That's who Georgia wants to
7 be president, that's who we the people voted for.

8 And then give us a election on January the 5th,
9 an entire down ballot vote that's fair, that's honest,
10 where nobody can cheat us again.

11 So the message needs to be sent: If they care
12 about we the people, they'll support we the people.
13 Remember, they don't have the power, they just have the
14 name "senator" in front of their names because you gave it
15 to them. Excuse me, Brian Kemp gave it to Kelly Loeffler,
16 not the people. I voted democrat, I voted republican. I
17 try to vote sometimes for the lesser of the two evils.
18 That's what happened when I voted for Brian Kemp over
19 Stacey Abrams. He'll never get my vote again. He's not
20 going to get your vote again either, is he?

21 Brian Kemp needs to go back down and get his
22 shotgun and go shoot quail and dove and let the people run
23 this state of Georgia. Get out of the damn oval, get out
24 of the mansion. You don't deserve to be there, Brian
25 Kemp. Get out of the basement, and take Brad

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1 Raffensperger with you. And take Geoffrey Duncan with you
2 too. Y'all go out on a quail shoot and leave Georgia
3 alone, because you're not doing the people's will.

4 Maybe it's time to look beyond the democrats and
5 the republicans. Maybe it's time for there to be a party
6 of the people. Maybe it's time for there to be a party of
7 American patriots, because I see American patriots
8 everywhere, and American patriots love America. We're not
9 going to be taken over by the Chinese. If you take -- if
10 you're taking China money, go to China. Don't stuff your
11 pockets with Chinese money when you buy Dominion or you
12 buy the COVID equipment from the people that sent the
13 virus over here. You don't buy bullets from the enemy.
14 Tell that to Brian Kemp because that's what he did.

15 Now, Sidney Powell and I want to try to answer
16 your questions. Sidney Powell, how about Sidney Powell
17 and Mike Flynn in 2024? He'll fight for America because
18 he'll fight like a Flynn.

19 I told you I'm not partisan. Vernon Jones for
20 governor. Vernon will fight like a Flynn.

21 How about some good, solid, hardworking American
22 patriot out of the crowd of people I see here today?

23 Run for governor, take back your state.

24 I support Donald Trump because he loves the
25 people. I spoke with him the other day, he called me. I

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1 want you to know one thing that he told me: He knows he
2 won this election. He said if I lost this election fair
3 and square, I would concede but he said, Lin, I didn't
4 lose it, I won it, and he said to me, with the conviction
5 of the president of the United States of America, I will
6 never concede.

7 Don't you ever concede, Mr. President.

8 You won this election. America voted for you.

9 Stay in the Whitehouse.

10 I'm not here -- when you get out front like this,
11 sometimes people say you're trying to make money. I don't
12 want your money. God's given me enough, and enough is
13 enough. But I will tell you to support my foundation,
14 #fightback. I formed it five months ago to defend and
15 preserve and protect the Constitution and our rights, and
16 I'm going to do it. You don't have to vote for me, you
17 don't have to give me any money but go to #fightback.law,
18 fightback.law and look at what we're trying to do, and
19 help us.

20 Now, I want to tell you a personal story, if you
21 don't mind. I was 16 years old -- I'm going to tell this
22 story first. That bus, Mr. Hamilton, brought over a
23 thousand people here today. Give him a hand, give him a
24 round of applause.

25 I was 16 years old. My mother died, went to the

1 morgue, and my father went to prison. I didn't have one
2 thin dime in my pocket. But I took the talent that God
3 gave me and I had the fighting spirit to make it but in
4 any other country in the world, I would not have made it.
5 I made it because I was born in America, and America gave
6 me the opportunity to succeed in my life, and that's why I
7 love America and that's why I'm going to fight for America
8 and that's why you're going to fight for America.

9 This is our country. Don't let anybody take it
10 away from us. It's 1776. This is our battle. This is
11 our fight. This is for our freedom. 1776 is back. Send
12 the message from Georgia, the battleground state of
13 Georgia, the battle starts here at Wills Park, in this
14 land, in this place, with these people. We're going to
15 take our country back again. It's 1776.

16 God bless you and God bless America.

17 CJ PEARSON: God bless America, Georgia. The
18 energy in this place is electric, and the reason it is is
19 because what the left doesn't seem to understand is that
20 we love this country so much so that we will fight for
21 this country so much.

22 They made the mistake of thinking that we were
23 going to just roll over and take it, that we were going to
24 let them steal this election, that we were going to let
25 them make Joe Biden president of these United States.

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1 Not in my America, no, no. They made the mistake
2 of thinking that we were still the party of Mitt Romney,
3 the party of John McCain, the party that didn't know how
4 to fight. But what they don't realize now is that we are
5 the party of Donald J. Trump. We are the party of
6 fighters, we are the party of courageous people who will
7 lay it all out on the field and fight for this nation
8 because if we don't fight for it, who will?

9 America is the greatest nation in the world but
10 it is not great by accident. It's great by the continued
11 activism of bold Americans like yourself who see that
12 America, while it is great, it takes work for it to be
13 great. Freedom doesn't just exist, it's preserved.
14 Liberty wasn't just created, it was brought into action by
15 patriots who had the courage to go out and fight for
16 something they believed in. That is what we are here
17 today, because America is so great that I'm going to fight
18 for it. You will too. You will too.

19 LIN WOOD: If you'll help us do this -- because
20 unlike Brian Kemp and Brad Raffensperger, we're going to
21 answer your questions. So what I'm going to ask you to do
22 -- and we've got to do it in a very orderly fashion,
23 please, if you can come around to the bus and we'll get a
24 line here and we'll pull you up here, you can ask your
25 question to Sidney Powell or I -- probably Sidney, she's

1 the smart one -- we'll give you the answers, we'll tell
2 you the truth.

3 So if anybody has a question, if you can kind of
4 make your way around here -- I kept some on the front row.

5 Before I do that, there's a lot of people that
6 have not been on the stage today, their names have not
7 been mentioned. I could call out some people on my staff:
8 Kimberly Bennett, Bob Saban, there's a host of people that
9 love this country, members of the staff, Brian
10 Castleberry, Jake, we've had so many people help us. I've
11 had tens of thousands of emails sent to me telling me how
12 they got cheated, offering to help. People love this
13 country. And I want to thank every one of 'em, even if
14 they're not named, they know who they are and God bless
15 'em.

16 If you'll try to give us your question clearly,
17 shortly and succinctly, here we go. Come on up. Y'all
18 help her up. This is the people's stage. Why don't you
19 tell us who you are and ask your question.

20 ANNE WALSH: Anne Walsh, and my question is --
21 first of all, Sidney, you're my hero.

22 LIN WOOD: She's everybody's hero.

23 ANNE WALSH: What should we say -- give us some
24 responses to give to friends or loved ones who think we're
25 crazy. I'm keeping the faith, I ingest the news that I

1 choose to ingest and I see that justice should prevail but
2 we have a lot of people who are discouraged and so they've
3 kind of get -- some of them have given up but what should
4 we say to them, other than we so believe?

5 LIN WOOD: I'm going to let Sidney answer that
6 but I'm going to tell you quickly what I'd tell 'em: You
7 tell 'em that only one perfect man walked on the face of
8 this earth and they said he was crazy too but he wasn't
9 crazy, he was Jesus Christ. Tell 'em they said the same
10 thing about Jesus. Sidney.

11 SIDNEY POWELL: These are very difficult times.
12 Some of us have lost good friends and family members have
13 gone a different way over the fact that we are insisting
14 on the truth. It's just extremely difficult. The press,
15 the mainstream press, is effectively brainwashing people.
16 Yeah, I think the best way to try to approach it is to
17 have a calm, factual conversation but at the same time, we
18 have to realize that the power of the media to lie is so
19 overwhelming that it's very hard for some people who won't
20 go to original source material or really be open to the
21 facts, to confront the reality that's really in front of
22 'em.

23 Yeah, digital soldiers, General Flynn's digital
24 soldiers have been a huge help in bringing us the truth.

25 So there are lots of people you can follow on

1 Twitter, but in terms of, you know, those personal
2 relationships that we've all lost, other than trying to
3 keep loving them and reaching out to them with the truth
4 and maintaining that consistency, I don't know -- there's
5 no easy answer for that.

6 LIN WOOD: You could also tell 'em turn off the
7 television. What was it Joe Biden said? Tell 'em to go
8 listen to the phonograph. I would tell anybody to think
9 for themselves. Don't accept what you read in the
10 newspapers and what you see on TV. They're liars.

11 Go look up a color revolution because that's
12 what's going on in America right now.

13 China's making its move because they need our
14 land to grow their food. They can't take four more years
15 of Donald Trump protecting America, so keep your guard up,
16 defend yourself and whatever it takes within the bounds of
17 law, you fight for your freedom.

18 MEMBER OF THE PUBLIC: So my question is, I've
19 been hearing a lot about the Dominion switching votes in
20 the computer, okay? But when they did the hand recount in
21 Georgia, why didn't we then see massive discrepancies
22 between what the computer totals were and what the paper
23 ballot recounts were if they moved 50,000 from Biden to
24 Trump, wouldn't we see 50,000 less Biden votes in the
25 recount?

1 LIN WOOD: Ran 'em back through the computer.

2 MEMBER OF THE PUBLIC: Yeah, but then the paper
3 ballots would have to match exactly.

4 LIN WOOD: If you get a hand count of the paper
5 ballots --

6 SIDNEY POWELL: And envelopes.

7 LIN WOOD: -- and envelopes on the absentees,
8 Donald Trump won Georgia by a landslide.

9 SIDNEY POWELL: Georgia did not do a full hand
10 recount of the ballots. In the one county where they did
11 do the hand recount, we found exactly what you're talking
12 about. It was a small precinct. I don't remember the
13 total number of votes but they flipped 37 from Trump to
14 Biden in this very small precinct. It was 52 or
15 52 percent, I think, of the votes there so they weighted
16 Biden votes at 1.52 and they weighted Trump votes at .48
17 when the votes went into the machine to change them.

18 People have been destroying ballots right and
19 left. We have shredded ballots that we found. It
20 wouldn't even be possible now in Georgia to accurately
21 count the actual ballots. Yeah, they have been destroying
22 evidence, there was a fake software update in Fulton
23 County. They took the server, they changed the server,
24 they've been destroying evidence right and left.

25 They know they're caught.

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1 There are several reasons why we can't get it
2 all. One, they're destroying evidence. Another is the
3 machines are actually built to even try to alter the audit
4 trail for them but we'd have to have a real hand count of
5 every ballot and every envelope to get an accurate count
6 of the votes.

7 LIN WOOD: I left some folks out real quick.

8 Ask yourself this question: If you're sending
9 money to the republican party in Georgia or you sent any
10 money to the national republican party, where the hell are
11 they? Where is Ronna McDaniel? Where's David Shafer?
12 Why are the republicans not fighting for Donald Trump? If
13 they don't fight for Donald Trump, including Loeffler and
14 Shafer, send 'em all home.

15 Kay Kent, board member, president's team, my kind
16 of person.

17 KAY KENT: We the people want to know the answer
18 to a question: What about all the veiled companies that
19 Brad Raffensperger has, the various incorporated companies
20 that Brad Raffensperger has? We would like to know an
21 answer to that question.

22 When we look at incorporated companies, I believe
23 that is public record.

24 LIN WOOD: I know about the law of defamation. I
25 know about the damn crooked FBI too. I represented

1 Richard Jewell. I know about fraud. Ask your company
2 called Devita, stole \$495 million of your taxpayer money.

3 I got it back for you.

4 The law of defamation says that if you make a
5 false statement against somebody that's defamatory, they
6 can sue you. Listen carefully, Governor Kemp; listen
7 carefully, Brad Raffensperger: I state as a matter of
8 fact that you are criminals, you took money from Dominion,
9 you took money from China with the COVID purchase, and I
10 damn well bet you will never sue me because the truth will
11 prove that I am right. You need to go to jail. Follow
12 the money. Follow the money. These fat cats sitting
13 around, spending your money, giving it to China, sticking
14 it in their family's pockets, that's not America.

15 This country's got to get back to the truth.

16 This is what you're here for. You're here
17 because you love truth. And I love truth too and I know
18 as a matter of fact spiritually and factually that only
19 the truth will set you free. Follow the money. Find the
20 truth. Let the people of Georgia know the truth and let's
21 get some new people running this state. Another question?

22 MEMBER OF THE PUBLIC: All right, how many people
23 here voted early in person? How many people? Okay,
24 because at the precinct where I voted early in person in
25 Dunwoody, at the Dunwoody library, they did something

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1 illegal. I spoke with a Congressperson yesterday who had
2 me back up when I told them the story and he was mortified
3 to hear what I told him.

4 I told him that after I pressed the stuff and the
5 piece of paper came out, my daughter was with me, we were
6 corralled over to a poll worker who looked at the top of
7 the ballot for the QR code to tell us which scanner to
8 scan our votes in. Did that happen to anyone else or was
9 it just in my precinct? How many other people did it
10 happen to? Did they touch your ballot? A lot of people.
11 Yes, they -- were there two separate scanners? For
12 everybody? No. Okay. Well, it was illegal. They're not
13 allowed to look at your ballot at all, and why, why did
14 they have us scan into two separate scanners, one for
15 Biden and one for Trump? Did you know that the user
16 manual for Dominion teaches them how to delete batches of
17 ballots? Did you know that? Did you know that?

18 LIN WOOD: I'll tell you what I didn't know, is
19 that I voted in person at Buckhead Library. I never knew
20 that my vote was going to leave Fulton County, pass
21 through Venezuela, Canada, find its way over to Barcelona
22 or Frankfurt and that I had cast it -- and we just learned
23 this -- on a machine with software that is 75 percent
24 owned by the Communist Party of China. I didn't vote on a
25 Chinese machine. I would never have done it.

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1 We've got to get back to simple rules.

2 They had one of the most legitimate elections in
3 recent history in Iraq. They voted by fingerprint. It's
4 not that hard. Think about the millions and millions and
5 millions of your dollars that have been wasted running
6 them back through these China machines.

7 He who has nothing to hide, hides nothing.

8 What is Brian Kemp hiding? What is Brad
9 Raffensperger hiding? Follow the money, follow those
10 corporations, find out what really happened to your vote,
11 and who sold it to China.

12 Gina Haspel. Gina Haspel is the director of the
13 CIA. Well, President Trump doesn't ask for my advice. If
14 he did, I'd give it to him about Gina Haspel: Fire Gina
15 Haspel yesterday, and fire Christopher Wray last week.

16 The deep state permeates the democrats, it
17 permeates the republicans. Donald Trump is fighting both
18 parties right now. The republicans are not helping him,
19 the democrats are not going to ever help him. They want
20 to get him out of office even so bad they cheat openly.

21 The only people that are helping Donald Trump are
22 people like you and me. We the people are helping Donald
23 Trump because we know that Donald Trump loves the people.

24 I spoke with a close friend of the president's
25 six months ago and he told me the first time the president

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1 ran, he was thinking about building up his brand and then
2 he decided to get out and not run, and then he went across
3 the country and he talked to the people and he decided to
4 run because he knew the people didn't have representation.

5 He ran for you the people. So he's not going to
6 stay in office because of the republican party, he's going
7 to stay in office because we the people demanded it when
8 we voted for him. I've looked at the real numbers. He
9 won over 410 electoral votes. He won -- damn near won
10 every state, including California. 80 plus million votes.

11 We're not going to let them steal our election.
12 We're not going to let them steal our country. And we
13 will die before we'll ever let them steal our freedom.

14 When I tell you it's 1776 again, there were 56
15 men that signed the declaration of independence. They
16 were pretty well off. They had been in America for a
17 hundred-plus years, they had a lot to lose; their
18 families, their plantations, their fortunes, the good
19 names that they had built up over the first hundred years
20 before 1776. 56 men signed the declaration of
21 independence. Remember this part of that declaration: We
22 pledge to each other our lives, our fortunes and our
23 sacred honor, and most of them lost their fortunes. Many
24 of them lost their lives. But they did it for their
25 children and their grandchildren and the generations to

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1 come, because they did it for freedom.

2 It's our time now. Pledge your life, your
3 fortune, your sacred honor to keep this country free.
4 This is our country. Keep America free. God bless every
5 one of you. Go to the Governor's Mansion, go to the State
6 Capitol, blow your horns, send a message, this is America.

7 We're going to keep it free.

8 God bless you all, and God bless America.

9 MEMBER OF THE PUBLIC: Thank you all for
10 listening to me. I'm in Florida and I'm also an attorney
11 but I'm not an attorney in Florida, I'm an attorney up
12 north. I came down here because I helped on the Trump
13 campaign this year in 2016 and I know Georgia went for
14 Trump. I know Georgia went for Perdue and Loeffler, okay.

15 So I went to the election office in Fayette
16 County. While I was waiting in line I saw a man and lady
17 in distress. I talked to them, I found out James Jacobs
18 and his wife Cheryl tried to vote in person on the day of
19 but they got (unintelligible) way back from 2000 they were
20 told no, you can't vote. You already voted by mail. They
21 said no, we did not, we want to vote in person. They were
22 forced to give -- they were given a provisional ballot, I
23 think it was done by (unintelligible) they were never told
24 (unintelligible) ballots that you never asked for down to
25 the office, we'll tear them up (unintelligible) in person.

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1 They were never told that. They were just told you can
2 vote by provisional mail. They voted by provisional mail
3 and it was put in a single box. They asked me, could you
4 help us get some paperwork, some kind of evidence that
5 (unintelligible) County, Trump, Perdue and Loeffler?

6 I said I'll do the best I can.

7 When I went back to the office on Saturday I
8 spoke to someone, she printed it out, they eventually got
9 the printout but the printout does not show who they voted
10 for. It doesn't show that they voted for Donald Trump.

11 So I want to thank Ms. Powell and Mr. Wood. I
12 consider you both a sister in the law. You're my mentors
13 and I love you and God bless you and keep you strong.

14 SIDNEY POWELL: You want an update on the
15 lawsuit? We're asking for an emergency appeal to the
16 Eleventh Circuit for some of the procedural problems that
17 arose unexpectedly and I think the Eleventh Circuit will
18 (unintelligible) and they will order the (unintelligible)
19 by impoundment of all of the Dominion machines
20 (unintelligible) despite a court order to preserve the
21 evidence in (unintelligible) counties (unintelligible). I
22 don't know why our government (unintelligible) impoundment
23 secure the machines immediately (unintelligible) partly
24 responsible for the fraud that was (unintelligible) and I
25 think the problem is we don't know -- I mean, I always

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1 assume that candidates in both parties and special
2 interests across the country, if not around the world,
3 have benefited from different use of these machines and
4 the software and the technology for at least 15 years or
5 so.

6 We have evidence that Hillary Clinton used it in
7 2016 to defeat Bernie Sanders in California, for example.

8 So it's happened before. This isn't the first
9 time. It's the first time it's been so blatant, and
10 that's because so many of you across the country voted for
11 Donald Trump that you broke the algorithm.

12 We have a witness from Venezuela who knows how
13 the machines work. He was there with Hugo Chavez right
14 through all of it. He was briefed on the operations and
15 then he saw it operating election night from the special
16 control room where they could flip the votes, drag and
17 drop and trash whatever they wanted to trash and make sure
18 Hugo Chavez won his reelection and he said that as soon as
19 he saw the voting stop in those states the night of the
20 election, when all of a sudden they all stopped, that was
21 exactly what had happened. The vote was so overwhelmingly
22 for Trump that they had to stop counting and go in and
23 backfill with fake ballots, ballots or take time to inject
24 votes into the machine that didn't exist and to trash
25 Trump votes.

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1 So yes, we the people of the United States'
2 elected Donald Trump president, and we're not going to
3 quit until he is.

4 LIN WOOD: I will see you tomorrow at the State
5 Capitol. Thank you. Stay mad as hell.

6 We're not going to take it anymore.

7 (End of transcription.)
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C E R T I F I C A T E

I, TERRI NESTORE, Certified Shorthand Reporter/
Transcriptionist, do hereby certify that I was authorized
to transcribe the foregoing recorded proceeding, and that
the transcript is a true and accurate transcription of my
shorthand notes, to the best of my ability, taken while
listening to the provided recording.

I further certify that I am not of counsel or
attorney for either or any of the parties to said
proceedings, nor in any way interested in the events of
this cause, and that I am not related to any of the
parties thereto.

Dated this 18th day of December, 2020.



TERRI NESTORE, CSR 5614, RPR, CRR

Exhibit 45



Sidney Powell 🇺🇸☆☆☆ #Kraken @SidneyPo... · Dec 10, 2020

80+ Million votes for @realDonaldTrump 🇺🇸🇺🇸🇺🇸🇺🇸🇺🇸

#TrumpWon

#TrumpLandslide

The election & the media were all #rigged

Your voters broke the #Dominion algorithm

You had the most votes in American history 🇺🇸

This election fraud must be completely exposed & ended NOW 4 the world



Donald J. Trump ✓ @realDonaldTrump · Dec 10, 2020

Why didn't the Fake News Media, the FBI and the DOJ report the Biden matter BEFORE the Election. Oh well, it's OK, we won the Election anyway - 75,000,000 VOTES!!!



Election officials have certified Joe Biden as the winner of the U.S. Presidential election

806

14.2K

40.9K



Exhibit 46



Sidney Powell 🇺🇸 ★★ ★ #Kraken
@SidneyPowell1

.@LLinWood with @gregkellyusa on status of
#ElectionFraud
in #Georgia and the country
#TrumpWon

There should be no more voting on computers or
#Dominion anywhere

Can only expect another #rigged result

youtu.be/w47ahbvE1XY

@realDonaldTrump

@POTUS

@KrakenWood

@Kraken_Wood



Lin Wood With Greg Kelly: Dicey Talk About Not Voting In ...

I now officially do not trust L Lin Wood. Why? He is basing
his opinion on a falsehood that the january runoff is ...

[youtube.com](https://youtu.be/w47ahbvE1XY)

12:13 AM · Dec 11, 2020 · Twitter for Android

5.2K Retweets **258** Quote Tweets **19K** Likes



Exhibit 47

Scientists say no credible evidence of computer fraud in the 2020 election outcome, but policymakers must work with experts to improve confidence

16 November 2020

We are specialists in election security, having studied the security of voting machines, voting systems, and technology used for government elections for decades.

We and other scientists have warned for many years that there are security weaknesses in voting systems and have advocated that election systems be better secured against malicious attack. As the National Academies recently concluded, “There is no realistic mechanism to fully secure vote casting and tabulation computer systems from cyber threats.” However, notwithstanding these serious concerns, we have never claimed that technical vulnerabilities have actually been exploited to alter the outcome of any US election.

Anyone asserting that a US election was “rigged” is making an *extraordinary* claim, one that must be supported by persuasive and verifiable evidence. Merely citing the existence of technical flaws does not establish that an attack occurred, much less that it altered an election outcome. It is simply speculation.

The presence of security weaknesses in election infrastructure does not by itself tell us that any election has actually been compromised. Technical, physical, and procedural safeguards complicate the task of maliciously exploiting election systems, as does monitoring of likely adversaries by law enforcement and the intelligence community. Altering an election outcome involves more than simply the existence of a technical vulnerability.

We are aware of alarming assertions being made that the 2020 election was “rigged” by exploiting technical vulnerabilities. However, in every case of which we are aware, these claims either have been unsubstantiated or are technically incoherent. To our collective knowledge, no credible evidence has been put forth that supports a conclusion that the 2020 election outcome in any state has been altered through technical compromise.

That said, it is imperative that the US continue working to bolster the security of elections against sophisticated adversaries. At a minimum, all states should employ election security practices and mechanisms recommended by experts to increase assurance in election outcomes, such as post-election risk-limiting audits.

If you are looking for a good place to start learning the facts about election security, we recommend the recent National Academies of Science, Engineering, and Medicine (NASEM) study, “Securing the Vote”, which is available for free download at <https://doi.org/10.17226/25120>.

Signed,

(Affiliations are for identification purposes only; listed alphabetically by surname.)

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2. Andrew W. Appel, Professor of Computer Science, Princeton University
3. Arlene Ash, Professor, University of Massachusetts Medical School
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5. Matt Blaze, McDevitt Chair of Computer Science and Law, Georgetown University
6. Duncan Buell, NCR Professor of Computer Science and Engineering, University of South Carolina
7. Michael D. Byrne, Professor of Psychological Sciences and Computer Science, Rice University
8. Jack Cable, Independent Security Researcher
9. Jeremy Clark, NSERC/Raymond Chabot Grant Thornton/Catallaxy Industrial Research Chair in Blockchain Technologies, Concordia Institute for Information Systems Engineering
10. Sandy Clark, Independent Security Researcher
11. Stephen Checkoway, Assistant Professor of Computer Science, Oberlin College
12. Richard DeMillo, Chair, School of Cybersecurity and Privacy and Warren Professor of Computing, Georgia Tech
13. David L. Dill, Donald E. Knuth Professor, Emeritus, in the School of Engineering, Stanford University
14. Zakir Durumeric, Assistant Professor of Computer Science, Stanford University
15. Aleksander Essex, Associate Professor of Software Engineering, Western University, Canada
16. David Evans, Professor of Computer Science, University of Virginia
17. Ariel J. Feldman, Software Engineer
18. Edward W. Felten, Robert E. Kahn Professor of Computer Science and Public Affairs, Princeton University
19. Bryan Ford, Professor of Computer and Communication Sciences, Swiss Federal Institute of Technology Lausanne (EPFL)
20. Joshua M. Franklin, Independent Security Researcher
21. Juan E. Gilbert, Banks Family Preeminence Endowed Professor & Chair, University of Florida
22. J. Alex Halderman, Professor of Computer Science and Engineering, University of Michigan
23. Joseph Lorenzo Hall, SVP Strong Internet, Internet Society
24. Harri Hursti, co-founder Nordic Innovation Labs and Election Integrity Foundation
25. Neil Jenkins, Chief Analytic Officer, Cyber Threat Alliance
26. David Jefferson, Lawrence Livermore National Laboratory (retired)
27. Douglas W. Jones, Associate Professor of Computer Science, University of Iowa

28. Joseph Kiniry, Principal Scientist, Galois, CEO and Chief Scientist, Free & Fair
29. Philip Kortum, Associate Professor of Psychological Sciences, Rice University
30. Carl E. Landwehr, Visiting Professor, University of Michigan
31. Maggie MacAlpine, co-founder Nordic Innovation Labs and Election Integrity Foundation
32. Bruce McConnell, former Deputy Under Secretary for Cybersecurity, Department of Homeland Security, (currently) President, EastWest Institute
33. Patrick McDaniel, Weiss Professor of Information and Communications Technology, Penn State University
34. Walter Mebane, Professor of Political Science and of Statistics, University of Michigan
35. Eric Mill, Chrome Security PM, Google
36. David Mussington, Professor of the Practice, School of Public Policy, University of Maryland College Park
37. Peter G. Neumann, Chief Scientist, SRI International Computer Science Lab
38. Lyell Read, Researcher at SSH Lab, Oregon State University
39. Ronald L. Rivest, Institute Professor, Massachusetts Institute of Technology
40. Aviel D. Rubin, Professor of Computer Science, Johns Hopkins University
41. Bruce Schneier, Fellow and Lecturer, Harvard Kennedy School
42. Alexander A. Schwarzmann, Dean of Computer and Cyber Sciences, Augusta University
43. Hovav Shacham, Professor of Computer Science, The University of Texas at Austin
44. Micah Sherr, Provost's Distinguished Associate Professor, Georgetown University
45. Barbara Simons, IBM Research (retired)
46. Kevin Skoglund, Chief Technologist, Citizens for Better Elections
47. Michael A. Specter, EECS PhD Candidate, MIT
48. Alex Stamos, Director, Stanford Internet Observatory
49. Philip B. Stark, Professor of Statistics and Associate Dean of Mathematical and Physical Sciences, University of California, Berkeley
50. Jacob Stauffer, Director of Operations, Coherent CYBER
51. Camille Stewart, Cyber Fellow, Harvard Belfer Center
52. Rachel Tobac, Hacker, CEO of SocialProof Security
53. Giovanni Vigna, Professor, Computer Science, University of California, Santa Barbara
54. Poorvi L. Vora, Professor of Computer Science, The George Washington University
55. Dan S. Wallach, Professor, Departments of Computer Science and Electrical & Computer Engineering, Rice Scholar, Baker Institute of Public Policy, Rice University
56. Tarah Wheeler, Cyber Fellow, Harvard Belfer Center
57. Eric Wustrow, Assistant Professor, Department of Electrical, Computer & Energy Engineering, University of Colorado Boulder
58. Ka-Ping Yee, Review Team Member, California Secretary of State's Top-to-Bottom Review of Voting Systems
59. Daniel M. Zimmerman, Principal Researcher, Galois and Principled Computer Scientist, Free & Fair

Exhibit 48

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FILE NAME:

The Affidavit Sidney Powell With Lou Dobbs
(8:10 min)

TRANSCRIPT OF VIDEO-RECORDED INTERVIEW

SIDNEY POWELL

LOU DOBBS

Transcribed By:
TERRI NESTORE
CSR No. 5614, RPR, CRR

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1 LOU DOBBS: Joining us now by phone, Sidney
2 Powell, a member of President Trump's legal team. She is
3 also General Michael Flynn's attorney, former federal
4 prosecutor, best selling author, one of the country's most
5 prominent appellate attorneys.

6 Sidney, good to have you with us. Dominion
7 Voting Systems seems to be figuring larger and larger in
8 the interest of your legal team, and what is the latest?

9 SIDNEY POWELL: Oh, definitely, Lou.

10 I've just gotten some stunning evidence from a
11 firsthand witness, a high-ranking military officer, who
12 was present when Smartmatic was designed in a way that --
13 and I'm going to just read to you some of these
14 statements, if you don't mind, so I get them exactly
15 right.

16 LOU DOBBS: Sure.

17 SIDNEY POWELL: From the affidavit: Designed in
18 a way that the system could change the vote of each voter
19 without being detected. He wanted the software itself to
20 function in such a manner that if the voter were to place
21 their thumbprint or fingerprint on a scanner, then the
22 thumbprint would be tied to a record of the voter's name
23 and identity as having voted but that voter would not be
24 tracked to the changed vote.

25 He made it clear that the system would have to be

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1 set up but not leave any evidence of the changed vote for
2 a specific voter, and that there would be no evidence to
3 show and nothing to contradict that the name or the
4 fingerprint or thumbprint was going with a changed vote.

5 Smartmatic agreed to create such a system and
6 produce the software and hardware that accomplished the
7 result for President Chavez.

8 After the Smartmatic electoral management system
9 was put in place, he closely observed several elections
10 where the results were manipulated using the Smartmatic
11 software. One such election was December 2006 when Chavez
12 was running against Rosales. Chavez won with a landslide
13 over Rosales, the margin of nearly 6 million votes for
14 Chavez, versus 3.7 million for Rosales.

15 In 2013 he witnessed another Venezuelan national
16 election where the Smartmatic management system was used
17 to manipulate and change the results for Chavez.

18 And it goes on and on.

19 He was in the control room where multiple digital
20 display screens were shown for results in voting, the
21 actual voting results were fed into that room and on to
22 the displays over an internet feed which was connected to
23 a sophisticated computer system created by Smartmatic.
24 People in that room were able to see in realtime whether
25 the votes that came through the electronic voting system

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1 was in their favor or against them. If one looked at any
2 particular screen, they could determine that the vote from
3 any specific area or as a national total was going to be
4 against either candidate.

5 Persons controlling the vote tabulation computer
6 had the ability to change the reporting of votes by moving
7 votes from one candidate to another by using the
8 Smartmatic software, and on and on it goes.

9 LOU DOBBS: Smartmatic, the relation --

10 SIDNEY POWELL: Smartmatic owns Dominion.

11 LOU DOBBS: Yes. And Smartmatic, the chairman is
12 Admiral Neffenger, who is also on the president -- the
13 vice president's transition team, his presidential --
14 presumptuous presidential transition team. That's an
15 extraordinary situation as well, isn't it?

16 SIDNEY POWELL: Yes, it is.

17 So here's the other kicker: When the Smartmatic
18 machines -- or when somebody's losing, like, for example,
19 when Maduro and his supporters realized the size of the
20 other guy's lead, they were worried that they were in
21 crisis mode and would lose the election, the Smartmatic
22 machines used for voting in each state were connected to
23 the internet, reported their information over the internet
24 so the control center in realtime said the decision was
25 made to reset the entire system.

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1 Maduro and his supporters ordered the network
2 controllers to take the internet itself offline in
3 practically all parts in Venezuela, to change the results.
4 It took the voting operators approximately two hours to
5 make the adjustments in the vote from Radonski to Maduro,
6 and then when they turned the internet back on and the
7 online reporting was up and running again, they checked
8 each screen, state by state, to be certain they could see
9 each vote was changed in favor of Maduro.

10 LOU DOBBS: Sidney, you tweeted earlier today
11 about the CIA and its association.

12 What have you discovered there?

13 SIDNEY POWELL: Well, other than the fact there's
14 no way all this was happening over and around the world
15 without the CIA knowing about it. I mean, that's just
16 logic.

17 It's been -- this affidavit also explains it's
18 been used to change election results all over the world,
19 and it's all Venezuelan and Cuban and essentially
20 Communist money that's been doing this.

21 It's a foreign owned company, as you mentioned
22 earlier. The president of it is Mr. Neffenger, who is on
23 Biden's very presumptuous and immediately failing
24 transition team.

25 And people have been reporting this to our

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1 government for several years, including democrats, and
2 nobody's done a damn thing about it, Lou.

3 I can't even express how furious I am over this.

4 LOU DOBBS: Well, I share your fury and
5 frustration, but I do have some news to break here at this
6 moment. I have now received word from a highly reliable
7 source that the FBI does have an investigative team that
8 is now looking into this election.

9 Now, what that means beyond that, but at least
10 it's confirmation that they are investigating and we'll
11 see what moves because there has been no indication that
12 indeed -- publicly, that they were involved. They are
13 now.

14 And to that point, I'd just like to show, if we
15 could put up the full screen, under what their authorities
16 are when we talk about these state run elections, even
17 though they're federal elections for at least a sizable
18 number of the candidates.

19 As you see there, the ballot includes one or more
20 federal candidates, an election or polling place official
21 abuses their office, the conduct involving false voter
22 registration, the crime intentionally targets minority
23 protected classes, the activity violates federal campaign
24 finance laws. All of this laid out on the FBI website for
25 anyone to look at.

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1 And it appears, Sidney, that at least the FBI has
2 finally looked at that website -- I'm not sure it was
3 Christopher Wray -- but someone at the FBI, and took
4 action. Your thoughts.

5 SIDNEY POWELL: Well, my other thought is that as
6 soon as the Smartmatic system changed the votes that they
7 wanted for their desired candidate, by the time they
8 finished, they achieve a convincing but narrow victory of
9 the certain number of votes they want for their candidate.

10 This person saw, by what his own experience,
11 exactly what was happening there was happening here.

12 LOU DOBBS: It's -- it is a deeply, deeply
13 troubling election, as I said earlier, the worst in this
14 country's history, bar none, and we have seen official
15 investigative and Justice Department officials slow to
16 move, and it is infuriating to everyone.

17 SIDNEY POWELL: No, we've seen willful blindness.

18 They have adopted a position of willful blindness
19 to this massive corruption across the country, and the
20 Smartmatic software is in the DNA of every vote tabulating
21 company's software and system.

22 LOU DOBBS: Yes, and it is more than just a
23 willful blindness. This is people trying to blind us to
24 what is going on. We don't even know who the hell really
25 owns these companies -- at least most of them.

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1 That's got to change and we've got to find out
2 exactly what's going on, and thank God we've got a
3 president who will stay in the fight all the way through
4 until we get those answers.

5 Sidney Powell, thanks so much.

6 We appreciate it, as always.

7 (End of recording.)

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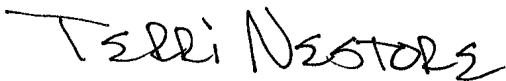
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I further certify that I am not of counsel or
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proceedings, nor in any way interested in the events of
this cause, and that I am not related to any of the
parties thereto.

Dated this 6th day of January, 2021.



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Exhibit 49

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FILE NAME:

Sidney Powell Follows Up With Lou Dobbs

About Today's Press Briefing

(6:08 min)

TRANSCRIPT OF VIDEO-RECORDED INTERVIEW

SIDNEY POWELL

LOU DOBBS

Transcribed By:
TERRI NESTORE
CSR No. 5614, RPR, CRR

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1 LOU DOBBS: And joining us now by phone is Sidney
2 Powell. She's a member obviously of the president's legal
3 team, also General Michael Flynn's defense attorney. A
4 great American. One of the country's leading appellate
5 attorneys.

6 Sidney, first of all, thanks. I know you are
7 going every which direction right now, busy as you could
8 possibly be.

9 Let's start out right now with the president's
10 path to victory here, as you and the legal team see it.
11 If you could give us just that canvas very quickly.

12 SIDNEY POWELL: Well, yes, Lou.

13 The entire election, frankly, in all the swing
14 states should be overturned and the legislatures should
15 make sure that the electors are selected for Trump, and
16 it's going to have to follow the constitutional provisions
17 that it go be decided according to the amendment.

18 It's just --

19 LOU DOBBS: Let's --

20 SIDNEY POWELL: Yes, go ahead.

21 LOU DOBBS: Let's turn to Smartmatic and
22 Dominion. Are they or are they not linked?

23 SIDNEY POWELL: Oh, they're definitely linked. I
24 would call them inextricably intertwined. They have the
25 same history from their inception. I'm sure they're

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1 trying to distance themselves from each other, but the
2 fact is that the Dominion machines run the Smartmatic
3 software or parts of the key code of it, and that is what
4 allows them to manipulate the votes in any way the
5 operators choose to manipulate them; and every time there
6 was a glitch, they called it, or connection to the
7 internet, they also violated state laws that required the
8 machines to be certified and nothing to be changed before
9 the votes.

10 There are any number of legal grounds on which
11 the use of those machines has to be stopped and the votes
12 invalidated.

13 LOU DOBBS: Now, are you pressing forward with
14 legal action against them for those violations?

15 SIDNEY POWELL: Not against the company and the
16 software, but the suits will be against the election
17 officials who invalidate the results of the election and
18 force it to the legislatures and the Electoral College and
19 the Congress, if necessary.

20 LOU DOBBS: There has been great controversy as
21 well, as you know, about reports of a raid on a company,
22 Scytl, in Germany which held election data, presumably,
23 and a raid that was carried out by U.S. forces, or so goes
24 the report, although the forces themselves were not
25 clearly identified, nor the event actually proven.

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1 Can you tell us what actually did happen there
2 and what you do know?

3 SIDNEY POWELL: Well, I know that is one of the
4 server centers. There's also one in Barcelona, so it is
5 related to the entire Smartmatic-Dominion software
6 operation. We do not know whether the good guys got the
7 servers or whether the bad guys got them. Being on the
8 outside of the government, we simply don't know. I'm
9 hoping it's the good guys and if they have that, then
10 there should be scads of evidence of, frankly, an
11 international conspiracy, criminal conspiracy of the worst
12 sort.

13 LOU DOBBS: And it's the presumption then that
14 they had the records on those servers of all of the votes
15 that were processed by Dominion or Smartmatic?

16 SIDNEY POWELL: Yes. The way it works, the votes
17 can be changed either on the ground as they come in.
18 People can watch the votes stream in live. For example,
19 there was a Dominion employee high up, high-ranking at the
20 Detroit center the night of the election. He could have
21 watched the votes come in live and manipulated them in
22 that process. It could have run an automatic algorithm
23 against all the votes, which we believe is what happened
24 originally and then the machines had to stop or the
25 counting had to stop in multiple places because President

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1 Trump's lead was so great at that point they had to stop
2 the counting and come in and backfill the votes they
3 needed to change the result.

4 LOU DOBBS: And let me ask you, as we wrap up
5 here, what is the next steps for the legal team and when
6 do you believe you will be prepared to come forward with
7 hard evidence establishing the basis for a court to
8 overturn elections or at least results of those elections
9 in a number of battleground states?

10 SIDNEY POWELL: Well, we are still in the process
11 of collecting evidence.

12 It's coming in in massive amounts.

13 LOU DOBBS: Right.

14 SIDNEY POWELL: And even today we're getting more
15 people coming forward, telling us the truth about what
16 happened. I would think we would have fraud complaints
17 ready sometime by late next week, at the latest, but like
18 I said, it's just a massive amount of information now.

19 We've got -- well, let me put it this way:
20 There's thousands of people in federal prisons on far less
21 evidence of criminal conduct than we have already against
22 the Smartmatic and Dominion Systems companies, and most of
23 the companies in the country have run the same sort of
24 software or have that code in their software, so it's
25 farther -- it's more widespread.

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1 LOU DOBBS: And incredibly, one of the benefits
2 of this may be that we will learn who actually owns these
3 companies. We have just watched, to everyone in this
4 audience tonight, our election is run by companies, the
5 ownership of which we don't know. Sidney Powell is among
6 those trying to change all of that.

7 Sidney Powell, thank you so much for being with
8 us. We appreciate it.

9 (End of recording.)
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I further certify that I am not of counsel or
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Exhibit 50



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File – Attorney Sidney Powell is pictured. (Ben Margot/AP Photo)

OAN Newsroom

UPDATED 7:26 AM PT – Wednesday, December 30, 2020

Attorney Sidney Powell recently gave a detailed interview on the evidence of election fraud after releasing a 270 page summary of her investigation.

“So far 5 states on election night is absolutely unprecedented,” she explained

OAN Newsroom

UPDATED 7:26 AM PT – Wednesday, December 30, 2020

Attorney Sidney Powell recently gave a detailed interview on the evidence of election fraud after releasing a 270 page summary of her investigation.

“So for 5 states on election night is absolutely unprecedented,” she explained. “And they did it because the vote count for the Electoral College was about to hit 270 for President Trump.”

Powell said the President won a second term in office on election night and Democrat officials had to use all the tools they had to prevent that from happening. She added, this includes foreign meddling, electronic manipulation of votes and expelling poll-watchers.

“The flipping of votes by Dominion is even advertised on their ability to do that, to run a fraction, to make a Biden vote count 1.26% and a Trump vote to only count 0.74%,” the attorney continued. “They done it in other foreign countries, they’ve done it in this country.”

Powell went on to note that voter fraud in this election was so rampant because President Trump’s landslide victory was breaking the Dominion algorithm.

LISTEN TO THE FULL INTERVIEW HERE:





Murray 
@Rothbard1776

18/ AUDIO [Part Two]



7:14 PM · Dec 29, 2020



7.3K 2.9K people are Tweeting about this

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Name

**Jackie Chiles** · 2 days ago

We know the machines were rigged, ballots were forged, the dead voted, Trump ballots were thrown in the trash, and after all that cheating, still Biden barely squeaked by.

Trump won and Biden lost in every way possible.

92 ^ | v 9 · Reply · Share >

**kaiju** → Jackie Chiles · 2 days ago

We all saw Trumps huge win on election night. We saw the vote counts stop in swing states. We saw the reports of poll watchers being denied access. We saw the 100% Biden counts come in. We saw the steal and we know where it happened and when it happened.

71 ^ | v 5 · Reply · Share >

**ocean** → kaiju · 2 days ago

The CNN election coverage showed the Election Fraud software Feedback Loop that flipped Trump votes to Biden. This was displayed on the TV for the whole world to see.

51 ^ | v 5 · Reply · Share >

**john** → ocean · 2 days ago

i so love the down votes -makes it easier to find the trolls and block them lol

11 ^ | v 1 · Reply · Share >

**Nullzip** → john · 2 days ago

Yeah but some of them are to cowardly to log in and display their names.

1 ^ | v 2 · Reply · Share >

**glen10** → john · an hour ago

If the downvotes went for the GOP why didn't the Trump vote do the same, people wanted to get rid of the scum bag

^ | v 1 · Reply · Share >

**Kooldaid** → ocean · 2 days ago


Really? Are really that stupid?


8 ^ | v 18 · Reply · Share >

**Yukon Cornelius** → Kooldaid · 2 days ago

Yes, you really are that stupid. Blocked..

28 ^ | v 3 · Reply · Share >

 **Kooldaid** → ocean · 2 days ago
Really? Are really that stupid?
8 ^ | ~ 18 · Reply · Share >

 **Yukon Cornelius** → Kooldaid · 2 days ago
Yes, you really are that stupid. Blocked.
28 ^ | ~ 3 · Reply · Share >


 **It's All Over But The Cryin'** → Yukon Cornelius · 2 days ago
Even more news emerged Tuesday that the presidential race was free and fair: A law enforcement audit of more than 15,000 absentee ballot envelope signatures in Cobb County, Georgia found no fraud or irregularities at all.


Between the Secretary of State's office and the Georgia Bureau of Investigation, investigators found just a handful of minor issues among the randomly-selected envelopes they reviewed.


Nine envelopes total had signatures that investigators believed didn't match official records, in one case because a voter's spouse signed his envelope for him. Another envelope was missing a signature. Investigators confirmed with all 10 voters that they'd cast the ballots in question.

The bottom line? "No fraudulent absentee ballots were identified during the audit," investigators said.

13 ^ | ~ 23 · Reply · Share >


 **Sniffachoo** → It's All Over But The Cryin' · 2 days ago
The proof is overwhelming. There is no verbal gesticulation or corrupt municipal officials that can change the proof that resides in the hands of those who have worked to investigate the election results. I too sat and watched the returns as they came in...and I remember the swamp creatures, Shiff, Pelosi, Nadler, Feinstine, Schumer, and dozens of other Democrats that were more than happy to destroy our existing government for their own gain. Let's not forget how heroic our president was during these past 4 years.
27 ^ | ~ 4 · Reply · Share >


 **Vandyman63** → Sniffachoo · 2 days ago
Thank you, Sniff.
Well stated!
8 ^ | ~ 1 · Reply · Share >


 **It's All Over But The Cryin'** → Sniffachoo · 2 days ago
"The proof is overwhelming."


It seems that way to you because you're paranoid. So with tunnel-vision, you typically focus on irrelevant information that supports your biases while ignoring the big picture.


5 ^ | ~ 6 · Reply · Share >

 **Lopoce** → It's All Over But The Cryin' · 2 days ago
SHUT UP COMMIE YOU ARE WEAK MINDED BUT WE ARE NOT
5 ^ | ~ 1 · Reply · Share >


 **glen10** → Lopoce · an hour ago


5 ^ | v 6 - Reply - Share >
 **Lopoce** → It's All Over But The Cryin' - 2 days ago
SHUT UP COMMIE YOU ARE WEAK MINDED BUT WE ARE NOT
5 ^ | v 1 - Reply - Share >

 **glen10** → Lopoce - an hour ago
Shut up N@zi Trump cult supporter
^ | v - Reply - Share >


 **Paleface** → It's All Over But The Cryin' - 2 days ago
The big picture is election fraud! You ignore actual evidence if it doesn't fit your narrative.
4 ^ | v 1 - Reply - Share >

 **Chuck Shick** → Sniffachoo - 2 days ago
Heroic?!
JFC buddy. Please don't operate machinery.
4 ^ | v 9 - Reply - Share >

 **Lopoce** → Chuck Shick - 2 days ago
S T F U moron
5 ^ | v - Reply - Share >

 **Chuck Shick** → Lopoce - 2 days ago · edited
Woowee! Check out this new troll's comments folks. Looks like little Billy showed his bigoted, angry grandpa how go online.
^ | v 1 - Reply - Share >


 **glen10** → Sniffachoo - 2 days ago
Trump in the past 4 years is the biggest liar, most corrupt, most incompetent, most bigoted president in history of the republic
^ | v 4 - Reply - Share >


 **TimPatriot** → glen10 - 2 days ago
You win for stupid post of the week.
6 ^ | v 1 - Reply - Share >


 **lolgy** → glen10 - 4 hours ago
coming from a sheep like you following the corrupt media?
GTFO
^ | v - Reply - Share >


 **glen10** → lolgy - an hour ago · edited
Not true , I don't watch FOX News, OAN, Newsmax or Breitbart Limbaugh etc. You are the one that has been duped
^ | v - Reply - Share >

 **Papa Louie** → Sniffachoo - 2 days ago
Hope you get a job.
^ | v 4 - Reply - Share >


 **con_fuse** → Sniffachoo - 2 days ago
There is literally zero evidence (let alone "proof") of any major fraud (enough to change the results). That is the conclusion of everyone that has looked at the so called 'evidence' submitted


 **Papa Louie** → Sniffachoo · 2 days ago
Hope you get a job!
^ | v 4 · Reply · Share >

 **con_fuse** → Sniffachoo · 2 days ago
There is literally zero evidence (let alone "proof") of any major fraud (enough to change the results). That is the conclusion of everyone that has looked at the so called 'evidence' submitted to courts.
You have to ask yourself why would some Republican's lie? All you have to do is look to your email where tRump and company are asking for money.
tRump has made more money in the last few weeks then he has made in the last 10 years.
Follow the money!
^ | v 10 · Reply · Share >

 **killermrob83** → con_fuse · 2 days ago
Trump IS the POTUS and will REMAIN the POTUS until his 2nd term is complete
7 ^ | v · Reply · Share >

 **bob** → killermrob83 · 18 hours ago
maybe longer! Who will be left when all the criminals that committed TREASON are put away? The whole democratic party is guilty!!!
1 ^ | v · Reply · Share >

 **glen10** → killermrob83 · 2 days ago
Know any more bad jokes
^ | v · Reply · Share >

 **bob** → glen10 · 18 hours ago
Your mom?
^ | v · Reply · Share >


 **glen10** → bob · 12 hours ago
my mom would never lie like that stupid bit-h
^ | v · Reply · Share >

 **tatoo** → killermrob83 · 2 days ago
We have never had a president try so hard to lose an election.
^ | v 2 · Reply · Share >

 **bob** → tatoo · 18 hours ago
Guess who will be sworn in soon. I'll give you a hint, his initials are DJT. Suck it libtard!
1 ^ | v · Reply · Share >


 **Lopoce** → con_fuse · 2 days ago
G F Y Commie scumbag. President Trump lost money to be President MORON
2 ^ | v · Reply · Share >


 **glen10** → Lopoce · 2 days ago
He lost nothing he has made millions screwing the government and contributors while in office
^ | v · Reply · Share >

 **G.F.V. Commie scumbag** · President Trump lost money to be President MORON


2 ^ | v - Reply - Share >

 **glen10** · Lopoce · 2 days ago
He lost nothing he has made millions screwing the government and contributors while in office
^ | v - Reply - Share >

 **Vandyman63** · con_fuse · 2 days ago
Corn_fused, any relation to Corn Pop??
2 ^ | v - Reply - Share >

 **carmen ramirez** · It's All Over But The Cryin' · 2 days ago
It's not whom or how many voted that counts, it's the ones counting the votes that matter. It's not the ones who witnessed the crime or how many that matter, it's the ones that prosecute the crimes or judge them that matters. In this case the investigators are in on the steal too. All for the hate of one man. When someone threatens the status quo, he is a threat to the system they are building. They will stop at nothing to preserve their power and financial gain.
16 ^ | v 2 - Reply - Share >

 **glen10** · carmen ramirez · 2 days ago
No one is more corrupt than Trump before and after being elected
^ | v - Reply - Share >

 **Duvel the elder** · carmen ramirez · 2 days ago
A pair of Trump fans die and get to the pearly gats. One asks St Peter "Ok who really won the election?"
St Peter says "Well Joe Biden of course."
The man looks to his friend and says "Man this conspiracy goes deep!"
^ | v 5 - Reply - Share >

 **Bwana** · It's All Over But The Cryin' · 2 days ago
Your lies are many. Just like your own upvotes. All lies. Perhaps you work for Dominion.
12 ^ | v 3 - Reply - Share >

 **It's All Over But The Cryin'** · Bwana · 2 days ago
The way that Trump cultists and jihadists self-brainwash is by shutting-out all legitimate information that doesn't make them feel good, while uncritically and automatically believing lies and misinformation from sources that do make them feel good (no matter how extreme and off-the-wall).
5 ^ | v 4 - Reply - Share >

 **Exposing The Fake News Media** · It's All Over But The Cryin' · 2 days ago · edited
The way that leftard cultists and jihadists self-brainwash is by shutting-out all legitimate information that doesn't make them feel good, while uncritically and automatically believing lies and misinformation from sources that do make them feel good (no matter how extreme and off-the-wall). There, fixed it for you.

The way that leftard cultists and jihadists self-brainwash is by shutting-out all legitimate information that doesn't make them feel good, while uncritically and automatically believing lies and misinformation from sources that do make them feel good (no matter how extreme and off-the-wall). There, fixed it for you.

2 ^ | v - Reply - Share >



Lopoce → It's All Over But The Cryin' · 2 days ago

You are a liar. All liars must pay

2 ^ | v - Reply - Share >



glen10 → Lopoce · 2 days ago

He owes nothing because he is 100% correct

^ | v 1 - Reply - Share >



Zacrohl Pesty → Bwana · 2 days ago

Potus skunk lied over 25k times in 4 years dam!!

^ | v - Reply - Share >



Lopoce → Zacrohl Pesty · 2 days ago

You are projecting stupid

1 ^ | v - Reply - Share >



Chuck Shick → Bwana · 2 days ago

The Denial is powerful in this one.

^ | v - Reply - Share >



Suzy Jules → It's All Over But The Cryin' · 2 days ago

Keep doing the same thing to get the same answer. Reviewed small counties, not the major city Fulton type counties.

6 ^ | v 2 - Reply - Share >



It's All Over But The Cryin' → Suzy Jules · 2 days ago · edited

Cobb County is a suburban county of Atlanta in the U.S. state of Georgia, located in the north central portion of the state. As of 2019, the population was 760,141, making it Georgia's third most-populous county.

EXCERPT FROM NY POST OPEN LETTER TO TRUMP

You had every right to investigate the election. But let's be clear: Those efforts have found nothing. To take just two examples: Your campaign paid \$3 million for a recount in two Wisconsin counties, and you lost by 87 more votes. Georgia did two recounts of the state, each time affirming Biden's win. These ballots were counted by hand, which alone debunks the claims of a Venezuelan vote-manipulating Kraken conspiracy.

-- NY Post, 12/27/2020

7 ^ | v 7 - Reply - Share >



Sniffachoo → It's All Over But The Cryin' · 2 days ago

Where were the mail-in ballots? Who counted the ballots?

What about the video that showed the suitcases of ballots being pulled out after the polls closed? I'm glad you referenced

TV Post, 12/27/2020

7 ^ | 7 - Reply - Share >

**Sniffachoo** → It's All Over But The Cryin' - 2 days ago

Where were the mail-in ballots? Who counted the ballots? What about the video that showed the suitcases of ballots being pulled out after the polls closed? I'm glad you referenced Venezuela...they had the same system in place, but nobody stopped them...and now the once-happy populace is eating out of the garbage trucks.

6 ^ | 7 - Reply - Share >

**Boo-urns** → Sniffachoo - 2 days ago

You realize that what was claimed to have been shown in those videos was debunked WEEKS ago, right?

^ | 1 - Reply - Share >

**Paleface** → Boo-urns - 2 days ago

It was never debunked, just swept under the rug! Georgia resident here, Carroll County, next to Cobb and Douglas County is between Carroll and Fulton. That was election fraud in Fulton County!

1 ^ | 1 - Reply - Share >

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McConnell Moderna New York OANN One

America News pandemic Pearson Sharp

Pennsylvania Pfizer President



Boo-urns → Sniffachoo · 2 days ago

You realize that what was claimed to have been shown in those videos was debunked WEEKS ago, right?

^ | 1 - Reply - Share >



Paleface → Boo-urns · 2 days ago

It was never debunked, just swept under the rug! Georgia resident here, Carroll County, next to Cobb and Douglas County is between Carroll and Fulton. That was election fraud in Fulton County!

1 ^ | 1 - Reply - Share >

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[Trump Administration](#) [Trump Legal](#)

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Exhibit 51

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File:

20201223 Sidney Powell's Latest Insight Into the
Fraudulent 2020 Election

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1 (music.)

2 SPEAKER: You lied repeatedly in the press,
3 and I was (inaudible) this information; and that
4 was an outright lie, and I told you to stop lying
5 and you continued to do it.

6 PRESIDENT OBAMA: If we say defund the
7 police, not just white folks, but Michelle's mom
8 might say, if I'm getting robbed, who am I going
9 to call and is somebody going to show up?

10 SPEAKER: Are you ready to say Pelosi and
11 Schumer need to go?

12 SPEAKER: The answer is yes. The answer
13 we -- we need to -- to shift power.

14 RECORDING: Freedom is back in style.
15 Welcome to the Revolution.

16 (Music.)

17 ANNOUNCER: The new Sean Hannity show.
18 More behind the scenes information on breaking
19 news and more bold inspired solutions for America.

20 ANNOUNCER: Stay right here for our final
21 news roundup and information overload.

22 LOUIE GOHMERT: This is Louie Gohmert,
23 sitting in for Sean. And, you know, that was Big
24 & Rich, bumper music coming in, but -- yeah, John
25 has a swimming pool on top of his house and my

1 name tag blew off; and when I went to tell him,
2 that window is right there into the side of the
3 people and -- John, I'm worried my name tag, is
4 going to clog up your filter.

5 So now he said we got a grinder, it will
6 grind it up. But he said: Yeah, we all watched
7 your name tag float by the window and everybody
8 said, look, Louie Gohmert's name tag, is floating
9 by the window.

10 That's what you can do when you got a
11 window into the side of your pool.

12 But anyway -- and speaking of John, a guy I
13 went all through school with in Mount Pleasant,
14 went to four years of A&M with, he said about our
15 last guest, hey, did he say Rumble, where -- where
16 can we watch his video?

17 Well, it is Rumble; and, apparently, that's
18 an alternative to YouTube for conservatives where
19 conservatives don't get censored and the truth can
20 come out. So that's a good thing.

21 But it's rumble.com. And it's Election Not
22 Returns; right, Linda?

23 LINDA: It's Election Night Facts. It
24 sounds like returns. I hear it.

25 LOUIE GOHMERT: Yeah. Okay. Election

1 Night Facts on Rumble.com. So you go to
2 Rumble.com, put in Election Night Facts, and you
3 will find the video that our last guest was
4 talking about.

5 Now, our guest we have with us now, she's a
6 friend, she's from Texas; and actually, I started
7 knowing more about her -- I heard about her, I
8 knew she had a great terrific book that exposed
9 corruption in the Department of Justice, A License
10 to Lie.

11 But Sidney Powell was a tremendous help to
12 Mike Flynn, until she ran into a criminal defense
13 attorney that thought -- or he thought he was a
14 criminal prosecutor, actually, even though he was
15 a federal judge. He kept trying to prosecute; he
16 should be impeached, I think.

17 But nonetheless, Michael Flynn is out from
18 under the savage misuse and injustice that the DOJ
19 hurled at him. And I'm glad to have Sidney Powell
20 on.

21 Sidney, great to have you --

22 SIDNEY POWELL: Hey.

23 LOUIE GOHMERT: -- on. And actually, you
24 and I -- you know, a couple years ago were
25 immersed in the fraud that was found to have

1 occurred in the Dallas County election two years
2 ago, and it was just -- we couldn't get people
3 that had authority to do what needed to be done to
4 save the country from going through what we've
5 been through.

6 But you've continued to go after this.
7 And, you know, they're independent attorneys going
8 after the fraud; and I know you're one person,
9 Sidney, that can verify that all of the fraud has
10 not been debunked. It's not unfounded.

11 So tell us about what you've been finding.

12 SIDNEY POWELL: Oh, Louie, you're
13 absolutely right. I mean, there's stunning
14 mathematical and statistical evidence and data
15 that's absolutely irrefutable of massive amounts
16 of votes just disappearing from the system in the
17 hundreds of thousands.

18 And we know, for example, that in Michigan
19 in Antrim County, when we actually examined the
20 Dominion voting machines, forensic experts did
21 that, that there were -- they -- they have this
22 way of sending votes computer-wise to what they
23 call adjudication, and then they can just
24 disappear them. And they did that for more than
25 80 percent of the votes. So somebody can just

1 drag and draft them -- drop them to the trash
2 file.

3 LOUIE GOHMERT: Well, it -- it's pretty
4 amazing -- of course, we heard that the machines
5 were never hooked up to the Internet, not
6 accessible by the Internet; and, yet, in Georgia
7 we had one of the workers saying, yeah, when there
8 was a problem with one of the voting machines or
9 an iPad, then they would contact their people
10 and -- I believe it was Dominion folks, wasn't it?
11 That would access her iPad, access the voting
12 machine, and get them fixed from a remote
13 location.

14 I'm not sure how you do that without having
15 those -- that equipment to -- accessible through
16 the Internet. Is there a way to do that
17 otherwise?

18 SIDNEY POWELL: No, it has to be -- it was
19 accessible through the Internet, and that's an
20 automatic violation of the federal law that
21 requires voting machines to be, you know,
22 protected from any sort of intrusion like that.

23 And we also know they erased certain files
24 on the machines in Antrim County, specifically the
25 adjudication files that would have shown exactly

1 where they put those votes that went missing.

2 And there is evidence from other people in
3 other states that machines were connected from the
4 inter- -- to the Internet; evidence from people in
5 multiple states that people uploaded thumb drives
6 of information to the machine. They can inject
7 votes and create votes from thin air. They have
8 done that, it appears, in any number of places.

9 This election is the biggest crime in
10 American history. And there was, in fact, foreign
11 interference in it. We already have a finding
12 from the FBI and CISA, C-I-S-A, the supposed
13 election security division of homeland security,
14 that there was foreign interference by Iran in
15 this election.

16 We have traced Internet information to
17 Serbia, China, Iran. It -- it was visible to
18 people who were watching the night of the election
19 and their data packages, they call them, that were
20 transferred between foreign countries regarding
21 our election.

22 The server in -- that's owned by Scytl, one
23 of the companies related to Dominion in Germany,
24 in Frankfurt, Germany, spiked 30 percent the night
25 of our election.

1 LOUIE GOHMERT: Unbelievable. Unreal.

2 Well, now, Sidney, you mentioned CISA, the
3 cyber security and infrastructure security agency,
4 that was headed by Christopher Krebs; and I saw a
5 puff piece on him the day of the election in which
6 he assured us that this would be the most secured
7 election ever, totally secure, no chance of any
8 problems.

9 Are you telling me that you have full faith
10 and credit in what Christopher Krebs has to say?

11 SIDNEY POWELL: Well, Mr. Krebs is either
12 incompetent or a liar, because when he spoke the
13 day of the election, he was ignoring a statement
14 publicly issued by the FBI and his organization a
15 few days before that found that Iran had
16 intentionally interfered in this electing- --
17 election and gotten information of over 200,000
18 voters at a minimum.

19 LOUIE GOHMERT: Well, I --

20 SIDNEY POWELL: And they can use that --

21 LOUIE GOHMERT: -- I have to --

22 SIDNEY POWELL: -- information to
23 manufacture votes, and distort the entire voting
24 process.

25 LOUIE GOHMERT: Well, sometimes people like

1 to take all the credit, but to his credit, in that
2 same election day article, he gave a lot of credit
3 to his dear friends in Silicon Valley for all of
4 their help in making sure everything was the way
5 it was supposed to be in our cyber security for
6 our elections.

7 So I guess you and I need to give some
8 credit to Sili- -- Silicone Valley for all their
9 help in creating a voting system, such as it was.

10 And again, you know I'm prone to sarcasm,
11 but --

12 SIDNEY POWELL: Right.

13 LOUIE GOHMERT: -- I'm -- I'm --

14 SIDNEY POWELL: Yeah, we need to give them
15 a lot of credit all right, because Mark Zuckerberg
16 spent over \$400 million to affect the vote and
17 create all kinds of issues for lawful voting in
18 any number of states; particularly the swing
19 states where we're seeing the problems. The
20 Thomas More Society, Amistad project, has
21 documented a lot of that. I haven't even had a
22 chance to review all that evidence; we've been
23 focused on the fraud that occurred across the
24 country as a result of the voting machines, and I
25 am not just talking about Dominion, they all use

1 the same software.

2 And I -- we're finding more and more
3 evidence that they ran an algorithm in the
4 machines that automatically flipped a certain
5 percentage of votes from Biden -- from Trump to
6 Biden to give Biden a 2.7 percent flip, which
7 amounts to like a 5.5 percent edge.

8 LOUIE GOHMERT: Well, that -- you know, we
9 have testimony from the CEO of Dominion voting
10 systems, John Poulos, and he made some statements
11 in testifying that were pretty dramatic. He said
12 that voting systems are by design meant to be used
13 as closed systems, not network -- meaning they're
14 not connected to the Internet.

15 He said that Dominion does not have any
16 ties to Smartmatic. Dominion and Smartmatic are
17 two separate companies. He said we do not use or
18 license Smartmatic software.

19 But as I understand it, Smartmatic software
20 has been incorporated into Dominion voting systems
21 since 2004; was -- was that your understanding?

22 SIDNEY POWELL: Yes, that's my
23 understanding. And there's also a lawsuit between
24 the two of them that documented their
25 relationship.

1 Tracy Beanz, T-R-A-C-Y, B-E-A-N-Z, on
2 Twitter, has a lovely thread that includes the
3 documents themselves so people can look at it
4 themselves and see what they think the
5 relationship between Smartmatic and Dominion is in
6 their own words.

7 LOUIE GOHMERT: Well, you know, we got
8 people that are asking what can be done about all
9 of this fraud. I mean, somebody needs to suffer
10 some consequences of the fraud; what would you
11 suggest?

12 You've seen this from a whole lot of
13 different angles, Sidney.

14 SIDNEY POWELL: Well, I don't think the
15 President is being well represented at all. In
16 fact, I think everyone around him is -- is
17 misrepresenting things to him, and misleading him
18 and not serving him well in any way, shape or
19 form; because he has the absolute authority under
20 the executive order entered in 2018, on election
21 security, that already declared a state of
22 emergency for it, and cites all the relevant
23 statutes and authorities that he can use to secure
24 the voting machines that need to be assessed
25 around the country, have them assessed, appoint

1 special counsel to oversee it all, and get that
2 done right now.

3 I have no doubts that if the shoe had been
4 on the other foot, and the democrats had been in
5 power, with the magnitude of fraud we have seen
6 running across this country in every way, shape
7 and form, whether it's dead voters, double voting,
8 massive injections of -- of false fake ballots
9 into the system; five systems stopping across the
10 country the night of the election, which has never
11 happened before.

12 Just lies from the Atlanta Fulton County
13 arena, the documented videotape of people pulling
14 buckets of ballots out from under a table after
15 they've run everybody off with a lie. And --
16 we've got thousands of affidavits all uploaded or
17 a lot of them uploaded, defending the
18 republic.org, so people can see the evidence and
19 testimony themselves, including the export
20 reports.

21 If the shoe had on been other foot, if this
22 had happened when Obama was in office, and this
23 method and madness had been used to defeat him,
24 they would have seized the machines the day after
25 the election --

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1 LOUIE GOHMERT: Yeah, but Sidney --

2 SIDNEY POWELL: -- and done the audit
3 immediately.

4 LOUIE GOHMERT: The -- there's a big
5 difference, though, there would have been a whole
6 bunch of republicans that would have been
7 encouraging that, so we could get to the bottom --

8 SIDNEY POWELL: Right.

9 LOUIE GOHMERT: -- of the fraud. Some of
10 us have spoken up when republicans have acted
11 inappropriately or abused somebody's rights under
12 the Fourth Amendment, but it just doesn't seem
13 that we get any of those people that sometimes
14 claim they're really concerned about civil rights
15 and about our rights under the constitution; they
16 seem to go completely silent unless they're
17 belittling those of us that just want justice.

18 SIDNEY POWELL: Yes. They're the ultimate
19 hypocrites, Louie, because even Senator Warren and
20 Klobuchar, and some others, in December of 2019,
21 were complaining about the Venezuelan connection
22 and the corruption in the Dominion systems. And
23 Carolyn Maloney was one of the congressmen who ten
24 years ago or so, called it out and tried to get
25 the government not to approve its use whatsoever.

1 LOUIE GOHMERT: Yeah.

2 SIDNEY POWELL: And you know who spread its
3 use, none other than Eric Holder, through an
4 antitrust settlement in the Justice Department
5 when he was there and expanded the use of the
6 Dominion machines.

7 LOUIE GOHMERT: Wow. Yeah.

8 SIDNEY POWELL: And there's a picture of
9 President Obama voting on one for the first time
10 in Chicago, as if it's a big accomplishment.

11 LOUIE GOHMERT: Wow.

12 SIDNEY POWELL: Well, it was for them.
13 They knew exactly what they were doing.

14 LOUIE GOHMERT: Goodness.

15 SIDNEY POWELL: They are behind all of
16 this, and more; but the government of China is
17 trying to steel the United States of America.
18 They bought us in any number of ways from any
19 number of our companies to our ports, to our real
20 estate, all of the country; now they have donated
21 millions -- hundreds of millions to universities
22 to steal our technology and data --

23 LOUIE GOHMERT: Huh. Wow. Yeah.

24 SIDNEY POWELL: -- President Trump is the
25 only person who has tried to rein them in on any

1 of it; and that's why they have been determined to
2 take him out.

3 LOUIE GOHMERT: Well, thank you, Sidney.

4 Thanks for your fight. You are a great
5 American --

6 (End of the recording.)

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C E R T I F I C A T E

I, JACKIE MENTECKY, do hereby certify that
I was authorized to transcribe the foregoing recorded
proceeding, and that the transcript is a true and
accurate transcription of my shorthand notes to the best
of my ability taken while listening to the provided
recording.

Dated this 29th day of December, 2020.

JACKIE MENTECKY

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Exhibit 52

STATE OF NORTH DAKOTA

IN DISTRICT COURT

COUNTY OF WARD

NORTH CENTRAL JUDICIAL DISTRICT

STATE OF NORTH DAKOTA EX REL.
WAYNE STENEHJEM,
ATTORNEY GENERAL,

Plaintiff,

Civil No. 51-2018-CV-01339

-vs-

TERPSICHORE MARAS, AKA
TERPSICHORE MARIA HELEN
LINDEMAN, AKA TERPSICHORE
LINDEMAN, AKA TERPSICHOR MARAS-
LINDEMAN, AKA TERPSICHORE MARAS-
LINDEMAN, AKA TERPSICHOR MARAS,
AKA TERPSICHORE P LINDEMAN, AKA
TERPSECHORE MARAS-LINDEMAN,
AKA TORE MARAS-LINDEMAN, AKA
TERPSICHOR LINDEMAN, AKA
TERPSECHORE MARAS-LINDEMAN,
AKA TERPSEHORE P MARAS-
LINDEMAN, AKA TERPSEHORE PETE
MARAS-LINDEMAN, AKA TERPSEHORE
MARAS-LINDEMAN, doing business as A
MAGIC CITY CHRISTMAS and MLLABS –
EVENTS,

Defendant.

**FINDINGS OF FACT, CONCLUSIONS
OF LAW, AND ORDER FOR
JUDGMENT**

CPAT 170233.001

[¶1] On August 11, 2020, Plaintiff State of North Dakota ex rel. Wayne Stenehjem, Attorney General (“State”), motioned the Court for Final Judgment After Default following the imposition of default for Defendant’s failure to comply with the Court’s discovery order. Index # 325.

[¶2] WHEREFORE, the Court, having reviewed the State’s Motion for Final Judgment After Default together with all supporting documents filed therewith and all

other documents filed in this matter, and the Court being duly advised on the premises of this action, makes the following findings of fact and conclusions of law:

I. FINDINGS OF FACT

[¶3] On July 24, 2018, the State initiated this consumer protection enforcement action against Defendant (Lindeman) by service of a Summons and Complaint. Index ## 1-3.

[¶4] On or about February 26, 2015, Defendant created a fundraising campaign on the website Indiegogo ostensibly to raise funds for families in Harvey, North Dakota that were displaced due to a fire that destroyed a building with apartments in it. Defendant raised approximately \$1,000.00 but did not disburse the funds to any of the victims of the Harvey fire and did not refund the donations to the donors. As late as December of 2017, Defendant attempted to obtain the funds for herself. Defendant also rebuffed offers to properly distribute the funds.

[¶5] Beginning in mid- to late 2017, Defendant began soliciting charitable contributions in connection her "A Magic City Christmas" event, an event Defendant described as a "benefit concert" that she purported to be organizing.

[¶6] Defendant solicited donations and made representations about her A Magic City Christmas events on various social media sites, including on Facebook and Twitter. Sometime prior to December 1, 2017, Defendant created a website advertising her A Magic City Christmas event that was located at www.magiccitychristmas.com. On her website and social media pages, Defendant represented that her event was for charitable purposes. Her website contained a page titled "Charity." Defendant represented that she was raising funds to support three homeless shelters located in Minot, North Dakota, and

she described her A Magic City Christmas event as a “Concert of Giving.” In addition to homeless shelters, Defendant represented that she intended to donate funds to other Minot beneficiaries, including the Bishop Ryan Catholic School.

[¶7] Defendant also engaged in the sale of merchandise on her website, including shirt and hats. Defendant represented that the proceeds of merchandise sales would be given to homeless shelters.

[¶8] On or about December 8, 2017, Defendant updated her “Our Mission” page of her website to represent that the intended beneficiaries of her charitable solicitations were local homeless shelters.

[¶9] Defendant also advertised her event on the Dakota Marketplace and Event Jams websites where she again represented that her concert was raising funds for homeless shelters in Minot, North Dakota.

[¶10] On her website and Facebook page, Defendant represented that the Bank of North Dakota was a sponsor, and used the logo of the Bank of North Dakota, even though the Bank of North Dakota had declined to sponsor her event and had not given her permission to use its logo. Defendant did not remove the Bank of North Dakota logo from her website until after she was asked multiple times to remove it. On her event’s Facebook page, Defendant continued to represent that the Bank of North Dakota was a sponsor. Defendant also represented that the Bank of North Dakota was a sponsor while seeking \$40,000 in donations on the website Fundly.

[¶11] In addition to using the logo of the Bank of North Dakota without permission, Defendant engaged in the solicitation of charitable contributions while using the Coin of the City of Minot on her website and Facebook page without permission. A representative of the City of Minot, on at least three occasions, requested that Defendant discontinue use of

the Coin because it was causing confusion that her event was sanctioned by or organized in association with the City. After Defendant failed to discontinue use of its Coin, on October 27, 2017, the City of Minot issued a press release disclaiming association with Defendant's event. Even after the City issued its press release, Defendant continued to display the Coin on her website and Facebook page.

[¶12] On or about December 6, 2017, Defendant began soliciting donations on GoFundMe and Fundly seeking a total of \$90,000. In connection with these solicitations, Defendant used an e-mail that she fabricated and claimed was sent to her by the Bank of North Dakota.

[¶13] As part of her charitable solicitations on GoFundMe, where she sought \$50,000, Defendant recorded an "offline" donation of \$500.00. In reality, Defendant herself was the purported "donor." Defendant recorded this false donation to give the impression to consumers that she had greater support than she actually did to induce others to give her donations, a practice known as "astroturfing" or "sockpuppetry."

[¶14] At the time that Defendant was purportedly soliciting charitable contributions for homeless shelters and other entities, Defendant was not registered with the North Dakota Secretary of State as either a charitable organization or professional fundraiser.

[¶15] Instead of using donations and contributions she received to fund her A Magic City Christmas event or giving the funds to homeless shelters, Defendant spent donations and sponsorship funds on herself, including to make purchases at Cash Wise, McDonald's, Marketplace, Wal-Mart, Waxing the City, and Target. Defendant's purchases for herself overdrew her bank account. Additionally, Defendant failed to ever secure basic necessities for her event, including sound production. Because Defendant overdrew her

account, she was unable to pay at least one performer that she attempted to pay and the check was returned twice due to nonsufficient funds.

[¶16] Overarching Defendant's online solicitations, Defendant, using various social media websites, created an entirely fake online persona. For example, Defendant falsely claimed to be a 22-year veteran of Naval intelligence and a Purple Heart recipient. She also falsely claimed that she was operating a medical laboratory ("ML Labs") and that she was doctor, among other false educational and employment accomplishments.

[¶17] On July 29, 2019, the Court granted the State's Motion to Compel and Request for Sanctions and imposed upon Defendant attorney's fees in the amount of \$3,018.40. Index # 201.

[¶18] On July 29, 2019, the Court granted the State's Motion for Summary Judgment as to Count 2 of the Complaint. Index # 202. The Court determined at this time that Defendant should have been registered as a charitable organization and that she had made personal expenditures for herself using the account she created for her A Magic City Christmas event.

[¶19] On August 7, 2020, the Court granted the State's Motion for Default Judgment after determining that Defendant's failure to comply with the Court's discovery orders was willful and in bad faith. Index # 325. Pursuant to N.D.R.Civ.P. 37(b)(2)(c), the Court granted the State's request for reasonable expenses in connection with its Motion for Default Judgment. *Id.* Prior to the Court's Order, the State requested \$3,600.00. Index # 303.

II. CONCLUSIONS OF LAW

[¶20] The State of North Dakota brought this action on the relation of Wayne Stenehjem, Attorney General of the State of North Dakota, in the public interest pursuant to N.D.C.C. chs. 50-22 and 51-15. The State of North Dakota ex rel. Wayne Stenehjem, Attorney General, has authority to act in this matter pursuant to N.D.C.C. chs. 50-22 and 51-15.

[¶21] The Court has subject matter jurisdiction pursuant to N.D.C.C. § 51-15-07.

[¶22] The Court has personal jurisdiction over Defendant.

[¶23] Under N.D.C.C. §§ 50-22-05, 50-22-06, 51-15-07, 51-15-10, and 51-15-11, this Court has jurisdiction to enter appropriate orders.

[¶24] The venue of this action in Ward County is proper under N.D.C.C. § 28-04-05 and § 28-04-03 because all or part of the cause of action arose in Ward County.

[¶25] “A default judgment entered by the court binds the party facing the default as having admitted all of the well pleaded allegations in the plaintiff’s complaint.” *Angelo lafrate Const., LLC v. Potashnick Const., Inc.*, 370 F.3d 715, 721–22 (8th Cir.2004). After the imposition of default, Defendant’s liability is established and the only outstanding matter is the extent of damages. In this case, a consumer protection law enforcement proceeding, “damages” are the equitable relief available to the State under N.D.C.C. chs. 50-22 and 51-15.

[¶26] N.D.C.C. § 50-22-04.3 provides:

50-22-04.3. Fraud – Misrepresentation.

A charitable organization, professional fundraiser, or any agent or employee of a charitable organization or professional fundraiser may not use any deceptive act or practice, fraud, false pretense, false promise, or misrepresentation with the intent that others rely thereon in connection with the solicitation of a contribution for or on behalf of a charitable organization.

N.D.C.C. § 50-22-04.3. N.D.C.C. § 51-15-02 provides:

51-15-02. Unlawful practices – Fraud – Misrepresentation. The act, use, or employment by any person of any deceptive act or practice, fraud, false pretense, false promise, or misrepresentation, with the intent that others rely thereon in connection with the sale or advertisement of any merchandise, whether or not any person has in fact been misled, deceived, or damaged thereby, is declared to be an unlawful practice.

N.D.C.C. § 51-15-02.

[¶27] Courts find deceptive acts and practices when a person solicits funds for a purported purpose and then fails to use donations for the purpose represented. *E.g.*, *People v. Coal. Against Breast Cancer, Inc.*, 134 A.D.3d 1081, 1082 (N.Y. App. Div. 2015); *People v. Orange Cty. Charitable Servs.*, 73 Cal. App. 4th 1054 (1999); *Com. by Zimmerman v. Soc’y of 28th Div., A.E.F. Corp.*, 113 Pa. Comwlth. 456, 465-66 (1987). Acts and practices are deceptive where they have the capacity or tendency to deceive. *State v. O’Neill Investigations, Inc.*, 609 P.2d 520, 520 (Alaska 1980); *State ex rel. Kidwell v. Master Distributors, Inc.*, 101 Idaho 447, 453-54 (1980).

[¶28] It is consumer fraud to “pass off” or use another entity’s label, trade name, trademark, or official seal without permission. *E.g.*, *Midway Mfg. Co. v. Dirkschneider*, 571 F. Supp. 282, 286 (D. Neb. 1983); *Bicentennial Comm’n v. Olde Bradford Co.*, 26 Pa. Comwlth. 636, 638 (1976); *J.C. Penney Co. v. Parrish Co.*, 339 F. Supp. 726, 727 (D. Idaho 1972); *Niresk Indus., Inc. v. F.T.C.*, 278 F.2d 337, 340, 341-42 (7th Cir. 1960). Similarly, it is deceptive to misrepresent affiliation with a governmental entity. *E.g.*, *In the Matter of Horizon Corp.*, 97 F.T.C. 464 (1981); *Rushing v. F.T.C.*, 320 F.2d 280 (5th Cir. 1963).

[¶29] It is a deceptive practice to disparage another by false or misleading representations. *E.g.*, *Ellis v. N. Star Co.*, 326 N.C. 219, 225-26 (1990); *In the Matter of*

Libbey-Owens-Ford Glass Co. et al., 69 F.T.C. 523 (1966). A person also perpetrates consumer fraud when they misrepresent their education or experience in connection in the sale or advertisement of merchandise. *E.g., Roggasch v. Sims*, 2016 Ark. App. 44, 7 (2016).

[¶30] Under N.D.C.C. ch. 31-11, it is presumed that Defendant's "unlawful act[s] [were] done with an unlawful intent," that Defendant "intend[ed] the ordinary consequences of [her] voluntary act[s]," and that "evidence willfully suppressed would be adverse if produced." N.D.C.C. § 31-11-03(2), (3), and (5).

[¶31] Defendant violated N.D.C.C. §§ 50-22-04.3 and 51-15-02 by: (1) soliciting donations for the victims of an apartment fire in Harvey, ND but did not distribute the proceeds to the victims; (2) soliciting donations while misrepresenting or "passing off" sponsorship by the Bank of North Dakota; (3) soliciting donations while misrepresenting or "passing off" as association with the City of Minot; (4) soliciting donations while misrepresenting receipt of an e-mail from the Bank of North Dakota that she fabricated or falsely attributed to the Bank of North Dakota; (5) using "sockpuppet" or "astroturfed" donations to induce others to donate to her online campaigns; (6) soliciting donations while misrepresenting education and experience that she does not possess; (7) soliciting contributions for a purported charitable purpose and then using the proceeds for personal expenses; and (8) soliciting contributions for charitable purposes and engaging in the advertisement and sale of merchandise under false pretenses.

[¶32] N.D.C.C. § 50-22-02(2) requires:

50-22-02. Registration of charitable organization.

1. A charitable organization may not solicit contributions from persons in this state by any means unless, prior to solicitation, there is on file with the secretary of state upon forms prescribed by the secretary of state a registration statement ... :

N.D.C.C. § 50-22-02(1). Defendant violated N.D.C.C. § 50-22-02(1) by failing to register with the Secretary of State prior to soliciting contributions for a charitable purpose in North Dakota.

[¶33] Under N.D.C.C. § 51-15-07, the Attorney General may seek and obtain “an injunction prohibiting [a] person from continuing [an] unlawful practice or engaging in the [an] unlawful practice or doing any act in furtherance of the unlawful practice,” and the Court “may make an order or judgment as may be necessary to prevent the use or employment by a person of any unlawful practices ...” N.D.C.C. § 51-15-07; *see also* N.D.C.C. § 50-22-05. Pursuant to N.D.C.C. §§ 50-22-5 and 51-15-07, injunctive relief is necessary and appropriate in this case in order to prohibit Defendant from engaging in continued or future violations of N.D.C.C. §§ 50-22-04.3 and 51-15-02, and injunctive relief is justifiable under the circumstances of this case.

[¶34] Under N.D.C.C. § 51-15-07, the Court “may make an order or judgment ... to restore to any person in interest any money, or property that may have been acquired by means of any practice” unlawful under N.D.C.C. ch. 51-15. N.D.C.C. § 51-15-07. Defendant is liable to pay such restitution necessary to restore any loss suffered by persons as a result of his deceptive acts or practices, pursuant to N.D.C.C. § 51-15-07.

[¶35] Under N.D.C.C. § 51-15-10, the Court “shall award to the attorney general reasonable attorney’s fees, investigation fees, costs, and expenses of any investigation and action brought” under N.D.C.C. ch. 51-15. N.D.C.C. § 51-15-10; *see also*, N.D.C.C. § 50-22-06. Defendant is liable to pay the Attorney General for the fees and costs incurred in investigating and prosecuting this matter, pursuant to N.D.C.C. §§ 50-22-06 and 51-15-10. The State requests fees and costs in the amount of \$16,618.40. This

amount is reasonable when considering that this proceeding has been ongoing since July 24, 2018.

[¶36] Under N.D.C.C. § 51-15-11, the Court “may assess for the benefit of the state a civil penalty of not more than five thousand dollars for each violation” of N.D.C.C. ch. 51-15. *See also*, N.D.C.C. § 50-22-05. Civil penalties are appropriate in this case based on Defendant’s conduct. N.D.C.C. §§ 50-22-05 and 51-15-11. The State requests the imposition of a civil penalty in the amount of \$9,000.00. This amount is appropriate where the Court could impose a maximum of \$5,000.00 per violation.

[¶37] Pursuant to N.D.C.C. §§ 47-25-07(3) and 51-15-07, it is appropriate to order cancellation of Defendant’s trade name, “MLLABS-EVENTS,” for Defendant’s use of the trade name to perpetrate consumer fraud.

III. ORDER FOR JUDGMENT

[¶38] THEREFORE, IT IS HEREBY ORDERED pursuant to N.D.C.C. ch. 50-22 and 51-15:

- A. Plaintiff’s Motion for Final Judgment After Default is granted.
- B. That Defendant is adjudged in violation of the charitable organizations soliciting contributions law, N.D.C.C. § 50-22-02, for soliciting charitable contributions without being properly registered.
- C. That Defendant is adjudged in violation of the charitable organizations soliciting contributions law, N.D.C.C. § 50-22-04.3, for engaging in deceptive acts or practices, fraud, false pretenses, false promises, or misrepresentations with the intent that others rely thereon in connection with the solicitation of charitable contributions in the State of North Dakota.

D. That Defendant is adjudged in violation of the consumer fraud law, N.D.C.C. § 51-15-02, for engaging in deceptive acts or practices, fraud, false pretenses, false promises, or misrepresentations, with the intent that others rely thereon in connection with the sale or advertisement of merchandise in the State of North Dakota.

E. That Defendant, her agents, employees, representatives, assigns, and all other persons in active concert or participation with her, pursuant to N.D.C.C. §§ 50-22-05 and 51-15-07, is permanently enjoined and restrained from directly or indirectly making false statements, false promises, or misrepresentations and the act, use and employment of any deceptive acts or practices in connection with the advertisement or sale of merchandise, as defined by N.D.C.C. § 51-15-01(3), within the State of North Dakota.

F. That Defendant, her agents, employees, representatives, assigns, and all other persons in active concert or participation with her, pursuant to N.D.C.C. §§ 50-22-05 and 51-15-07, is permanently enjoined and restrained from engaging in deceptive acts or practices and from directly or indirectly making false statements, false promises, or misrepresentations in connection with the advertisement or solicitation of charitable contributions, or any other merchandise, as defined by N.D.C.C. § 51-15-01(3).

G. That Defendant, her agents, employees, representatives, assigns and all other persons in active concert or participation with her, pursuant to N.D.C.C. §§ 50-22-05 and 51-15-07, is enjoined and restrained from the advertising or solicitation of charitable contributions in accordance with paragraph H.

H. That, pursuant to N.D.C.C. §§ 50-22-05 and 51-15-07, Defendant, her agents, employees, representatives, assigns, and all other persons in active concert or participation with her, is permanently enjoined and restrained from engaging in the solicitation of charitable contributions. Notwithstanding the permanent injunction,

Defendant may engage in the future engage in the solicitation of charitable contributions if Defendant applies to the Attorney General and the Court to lift the permanent injunction and the Court finds Defendant has fully complied with the following terms and conditions and otherwise are rehabilitated:

1. Five or more years have expired since the entry of judgment herein;
2. Defendant has paid in full all restitution to consumers pursuant to the judgment herein;
3. Defendant has paid in full restitution to all consumers that have paid Defendants advance payments for services not performed or merchandise not delivered in the state of North Dakota;
4. Defendant has paid all amounts owed to the Attorney General pursuant to entry of judgment herein;

If the Court thereafter finds, pursuant to an agreement between the Attorney General and Defendant, or after a hearing, that Defendant is sufficiently rehabilitated pursuant to the terms and conditions herein, Defendant, upon order of the Court, may engage in the solicitation of charitable contributions provided she has registered with the Secretary of State pursuant to N.D.C.C. ch. 50-22 and has complied with all other requirements appropriate and necessary for the work to be undertaken by her. "Pay in full" or "paid in full" mean that all amounts must be paid, and does not include any settlement, forgiveness, compromise, reduction, or discharge of any of the debts or refund obligations.

I. That Plaintiff shall have Judgment against Defendant in the amount of \$9,000.00 for civil penalties, pursuant to N.D.C.C. §§ 50-22-05 and 51-15-11.

J. That Plaintiff shall have Judgment against Defendant in the amount of \$16,618.40 (the total of \$3,018.40, \$3,600.00, and \$10,000.00) for costs, expenses, and

attorney's fees pursuant to N.D.C.C. § 51-15-10, incurred by the Attorney General in the investigation and prosecution of this action.

K. That Defendant, pursuant to N.D.C.C. § 51-15-07, shall pay restitution to all North Dakota consumers, which have suffered any ascertainable loss, and to restore to any person in interest any moneys or property, real or personal, which has been acquired by Defendant by means of any practice declared to be unlawful under N.D.C.C. §§ 50-22-04.3 or 51-15-02.

L. The Judgment entered shall be a Judgment for which execution may issue.

M. Interest shall accrue on this Judgment in accordance with the interest rate on judgment as provided by N.D.C.C. § 28-20-34.

N. That, pursuant to N.D.C.C. §§ 47-25-07(3) and 51-15-07, Defendant's trade name, "MLLABS-EVENTS," is ordered cancelled for Defendant's use of the trade name to perpetrate consumer fraud.

Signed: 9/11/2020 9:45:19 PM

BY THE COURT:

Todd Cresap


District Court Judge

STATE OF NORTH DAKOTA

IN DISTRICT COURT

COUNTY OF WARD

NORTH CENTRAL JUDICIAL DISTRICT

STATE OF NORTH DAKOTA EX REL.
WAYNE STENEHJEM,
ATTORNEY GENERAL,

Plaintiff,

Civil No. 51-2018-CV-01339

-vs-

TERPSICHORE MARAS, AKA
TERPSICHORE MARIA HELEN
LINDEMAN, AKA TERPSICHORE
LINDEMAN, AKA TERPSICHOR MARAS-
LINDEMAN, AKA TERPSICHORE MARAS-
LINDEMAN, AKA TERPSICHOR MARAS,
AKA TERPSICHORE P LINDEMAN, AKA
TERPSECHORE MARAS-LINDEMAN,
AKA TORE MARAS-LINDEMAN, AKA
TERPSICHOR LINDEMAN, AKA
TERPSECHORE MARAS-LINDEMAN,
AKA TERPSEHORE P MARAS-
LINDEMAN, AKA TERPSEHORE PETE
MARAS-LINDEMAN, AKA TERPSEHORE
MARAS-LINDEMAN, doing business as A
MAGIC CITY CHRISTMAS and MLLABS –
EVENTS,

Defendant.

JUDGMENT

CPAT 170233.001

[¶1] This matter having come before this Court on Plaintiff State of North Dakota ex rel. Wayne Stenehjem, Attorney General's Motion for Final Judgment After Default. The Court, having issued an Order for Judgment and being fully advised of the premises, **IT IS HEREBY ORDERED, ADJUDGED, AND DECREED:**

A. Plaintiff's Motion for Final Judgment After Default is granted.

B. Defendant is adjudged in violation of the charitable organizations soliciting contributions law, N.D.C.C. § 50-22-02, for soliciting charitable contributions without being properly registered.

C. That Defendant is adjudged in violation of the charitable organizations soliciting contributions law, N.D.C.C. § 50-22-04.3, for engaging in deceptive acts or practices, fraud, false pretenses, false promises, or misrepresentations with the intent that others rely thereon in connection with the solicitation of charitable contributions in the State of North Dakota.

D. That Defendant is adjudged in violation of the consumer fraud law, N.D.C.C. § 51-15-02, for engaging in deceptive acts or practices, fraud, false pretenses, false promises, or misrepresentations, with the intent that others rely thereon in connection with the sale or advertisement of merchandise in the State of North Dakota.

E. That Defendant, her agents, employees, representatives, assigns, and all other persons in active concert or participation with her, pursuant to N.D.C.C. §§ 50-22-05 and 51-15-07, is permanently enjoined and restrained from directly or indirectly making false statements, false promises, or misrepresentations and the act, use and employment of any deceptive acts or practices in connection with the advertisement or sale of merchandise, as defined by N.D.C.C. § 51-15-01(3), within the State of North Dakota.

F. That Defendant, her agents, employees, representatives, assigns, and all other persons in active concert or participation with her, pursuant to N.D.C.C. §§ 50-22-05 and 51-15-07, is permanently enjoined and restrained from engaging in deceptive acts or practices and from directly or indirectly making false statements, false promises, or misrepresentations in connection with the advertisement or solicitation of charitable contributions, or any other merchandise, as defined by N.D.C.C. § 51-15-01(3).

G. That Defendant, her agents, employees, representatives, assigns and all other persons in active concert or participation with her, pursuant to N.D.C.C. §§ 50-22-05 and 51-15-07, is enjoined and restrained from the advertising or solicitation of charitable contributions in accordance with paragraph H.

H. That, pursuant to N.D.C.C. §§ 50-22-05 and 51-15-07, Defendant, her agents, employees, representatives, assigns, and all other persons in active concert or participation with her, is permanently enjoined and restrained from engaging in the solicitation of charitable contributions. Notwithstanding the permanent injunction, Defendant may engage in the future engage in the solicitation of charitable contributions if Defendant applies to the Attorney General and the Court to lift the permanent injunction and the Court finds Defendant has fully complied with the following terms and conditions and otherwise are rehabilitated:

1. Five or more years have expired since the entry of judgment herein;
2. Defendant has paid in full all restitution to consumers pursuant to the judgment herein;
3. Defendant has paid in full restitution to all consumers that have paid Defendants advance payments for services not performed or merchandise not delivered in the state of North Dakota;
4. Defendant has paid all amounts owed to the Attorney General pursuant to entry of judgment herein;

If the Court thereafter finds, pursuant to an agreement between the Attorney General and Defendant, or after a hearing, that Defendant is sufficiently rehabilitated pursuant to the terms and conditions herein, Defendant, upon order of the Court, may engage in the solicitation of charitable contributions provided she has registered with the

Secretary of State pursuant to N.D.C.C. ch. 50-22 and has complied with all other requirements appropriate and necessary for the work to be undertaken by her. "Pay in full" or "paid in full" mean that all amounts must be paid, and does not include any settlement, forgiveness, compromise, reduction, or discharge of any of the debts or refund obligations.

I. That Plaintiff shall have Judgment against Defendant in the amount of \$9,000.00 for civil penalties, pursuant to N.D.C.C. §§ 50-22-05 and 51-15-11.

J. That Plaintiff shall have Judgment against Defendant in the amount of \$16,618.40 (the total of \$3,018.40, \$3,600.00, and \$10,000.00) for costs, expenses, and attorney's fees pursuant to N.D.C.C. § 51-15-10, incurred by the Attorney General in the investigation and prosecution of this action.

K. That Defendant, pursuant to N.D.C.C. § 51-15-07, shall pay restitution to all North Dakota consumers, which have suffered any ascertainable loss, and to restore to any person in interest any moneys or property, real or personal, which has been acquired by Defendant by means of any practice declared to be unlawful under N.D.C.C. §§ 50-22-04.3 or 51-15-02.

L. The Judgment entered shall be a Judgment for which execution may issue.

M. Interest shall accrue on this Judgment in accordance with the interest rate on judgment as provided by N.D.C.C. § 28-20-34.

N. That, pursuant to N.D.C.C. §§ 47-25-07(3) and 51-15-07, Defendant's trade name, "MLLABS-EVENTS," is ordered cancelled for Defendant's use of the trade name to perpetrate consumer fraud.

CLERK OF DISTRICT COURT

Signed: 9/14/2020 4:22:38 PM

Lisa Beggs

Exhibit 53

MATCH YOUR GIFT BY 12/31

DONATE

Election 2020

Transfer of Power

Facts on election integrity

Biden Cabinet

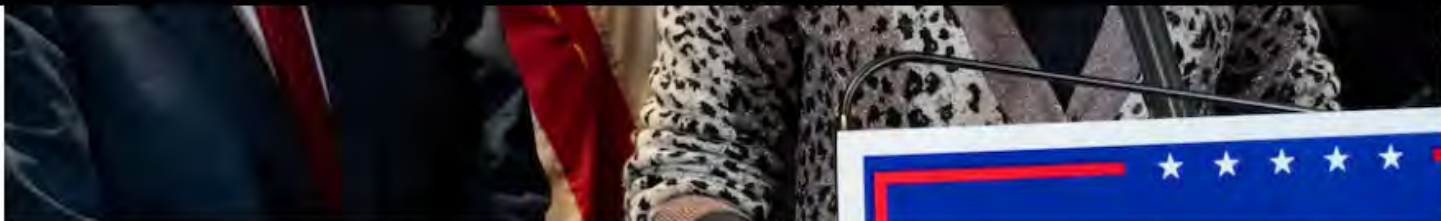
Georgia runoffs

Full election results

Investigations

Sidney Powell's secret intelligence contractor witness is a pro-Trump podcaster





Sidney Powell speaks next to former New York mayor Rudolph W. Giuliani as members of President Trump's legal team during a Nov. 19 news conference in Washington. (Jacquelyn Martin/AP)

By **Jon Swaine**

Dec. 24, 2020 at 9:03 p.m. GMT

+ Add to list

As she asked the U.S. Supreme Court this month to overturn President Trump's election loss, the attorney Sidney Powell cited testimony from a secret witness presented as a former intelligence contractor with insights on a foreign conspiracy to subvert democracy.

Powell told courts that the witness is an expert who could show that overseas corporations helped shift votes to President-elect Joe Biden. The witness's identity must be concealed from the public, Powell has said, to protect her "reputation, professional career and personal safety."

The Washington Post identified the witness by determining that portions of her affidavit match, sometimes verbatim, a [blog post](#) that the pro-Trump podcaster Terpsichore Maras-Lindeman published in November 2019. In an interview, Maras-Lindeman confirmed that she wrote the affidavit and said she viewed it as her contribution to a fight against the theft of the election.



When Fishing Goes hilariously Wrong

Photo Gallery

[See Now](#)

"This is everybody's duty," she said. "It's just not fair."

“This is everybody’s duty,” she said. “It’s just not fair.”

In a recent civil fraud case, attorneys for the state of North Dakota said that Maras-Lindeman falsely claimed to be a medical doctor and to have both a PhD and an MBA. They said she used multiple aliases and social security numbers and created exaggerated online résumés as part of what they called “a persistent effort . . . to deceive others.”

Powell’s reliance on Maras-Lindeman’s testimony may raise further questions about her judgment and the strength of her arguments at a time when she is becoming an increasingly influential adviser to the president. Trump’s legal team distanced itself from Powell last month after she falsely claimed Republican state officials took bribes to rig the election. But she has visited the White House three times in the past week, once to participate in an Oval Office meeting. Trump has weighed naming Powell a special counsel to investigate the election, according to previous reports.



Since Nov. 4, President Trump has repeatedly claimed his election loss as a result of massive fraud. The following is a roundup of his claims. (The Washington Post)

Maras-Lindeman, 40, moved to the Navy for less than a year more than two decades ago and has

Since Nov. 4, President Trump has repeatedly claimed his election loss as a result of massive fraud. The following is a roundup of his claims. (The Washington Post)

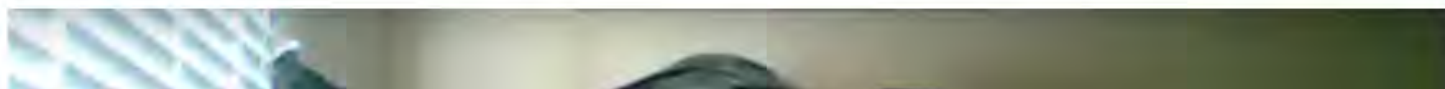
Maras-Lindeman, 42, served in the Navy for less than a year more than two decades ago and has said she worked later as a government contractor and part-time interpreter. She has identified herself as a “trained cryptolinguist.”



North Dakota’s assertions about her credentials came in a civil case brought by the state’s attorney general in 2018 over a purported charitable event she tried to organize in Minot, N.D., where she and her family resided. Attorneys for the state said she used money she collected — ostensibly to fund homeless shelters and wreaths for veterans’ graves — on purchases for herself at McDonald’s, QVC and elsewhere.

A judge ultimately found that Maras-Lindeman violated consumer protection laws by, among other things, mispending money she raised and soliciting donations while misrepresenting her experience and education. He ordered her to pay more than \$25,000.

Maras-Lindeman has appealed to the state Supreme Court. In court filings and in her interview with The Post, she denied mishandling the funds or misleading donors. She blamed identity theft and bureaucratic failings for a proliferation of variations on her name and social security numbers associated with her.



associated with her.



Terpsichore Maras-Lindeman appears on Valley News Live VKX4's segment POVnow on March 12, 2019. (Gray Media Group, Inc., KVLV)

Maras-Lindeman also claimed that she was targeted by the state for political reasons, noting that around that time she was exploring running for mayor of Minot — under the slogan “Make Minot Great Again.” She said that in 2018 she assisted the campaign of David C. Thompson, the Democratic challenger to longtime Attorney General Wayne Stenehjem (R). Thompson is now Maras-Lindeman’s defense attorney.

AD



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Thompson said in an interview that the case was a “vindictive exercise” and was excessive given the relatively small amounts of money in question. “They took a missile to kill a fly,” he said.

In an interview, Stenehjem — who signed a brief this month asking the Supreme Court to take up a case that sought to overturn the election — dismissed the claim that his investigation was politically motivated and said that anyone working with Maras-Lindeman should “back away” from her.

In a text message, Powell did not directly address questions about Maras-Lindeman’s fraud case and credentials. “I don’t have the same information you do,” she wrote to The Post.

Powell’s lawsuits — litigation she has referred to as “the kraken,” after a Scandinavian mythological sea monster — rely in key respects on a handful of anonymous expert witnesses. Among them is a purported military intelligence expert identified in court filings as “Spyder.” [The Post reported](#) this month that the witness is an I.T. consultant named Joshua Merritt who has never worked in military intelligence. Rather, Merritt spent the bulk of his decade in the Army as a wheeled-vehicle mechanic.



Device Lights Up Your Kitchen

Transform any kitchen with these lights in 5 mins & under \$50.

[Open](#)

Like Merritt, Maras-Lindeman told The Post she had never spoken directly to Powell or anyone working on her legal team. She said she distributed the affidavit widely to like-minded people and

Like Merritt, Maras-Lindeman told The Post she had never spoken directly to Powell or anyone working on her legal team. She said she distributed the affidavit widely to like-minded people and was unaware it had come to Powell's attention until it appeared as an exhibit in one of her cases.

Maras-Lindeman's 37-page [affidavit](#) outlines a purported conspiracy by the Canadian company Dominion Voting Systems, which sells voting machines used in some states, and Scytl, a Spain-based firm that provides election software. She claims that votes cast on Dominion machines in key states were hacked as they passed through Scytl tallying systems and rigged in favor of Biden.

"The vote is not safe using these machines not only because of the method used for ballot 'cleansing' to maintain anonymity but the EXPOSURE to foreign interference and possible domestic bad actors," she writes in the affidavit.



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Like Trump and many of his supporters, Maras-Lindeman points to election night spikes in Biden's vote totals — explained by officials as merely the result of densely populated areas reporting their counts — as evidence of a "digital fix" involving abrupt dumps of bogus votes.

In a [statement](#) last month, Dominion described allegations leveled against it by Powell and other Trump supporters as "baseless, senseless, physically impossible, and unsupported by any evidence whatsoever." Scytl said in a statement that it "does NOT tabulate, tally or count votes in US public elections," had no relationship with Dominion, and that its U.S. operations are run by a Tampa-based subsidiary.

whatsoever.” Scytal said in a statement that it “does NOT tabulate, tally or count votes in US public elections,” had no relationship with Dominion, and that its U.S. operations are run by a Tampa-based subsidiary.



Powell's lawsuits — litigation she has referred to as “the kraken,” after a Scandinavian mythological sea monster — rely in key respects on a handful of anonymous expert witnesses. (Ben Margot/AP)

Last week, Dominion said it had written to Powell to [demand that she retract](#) what the company said were defamatory accusations.



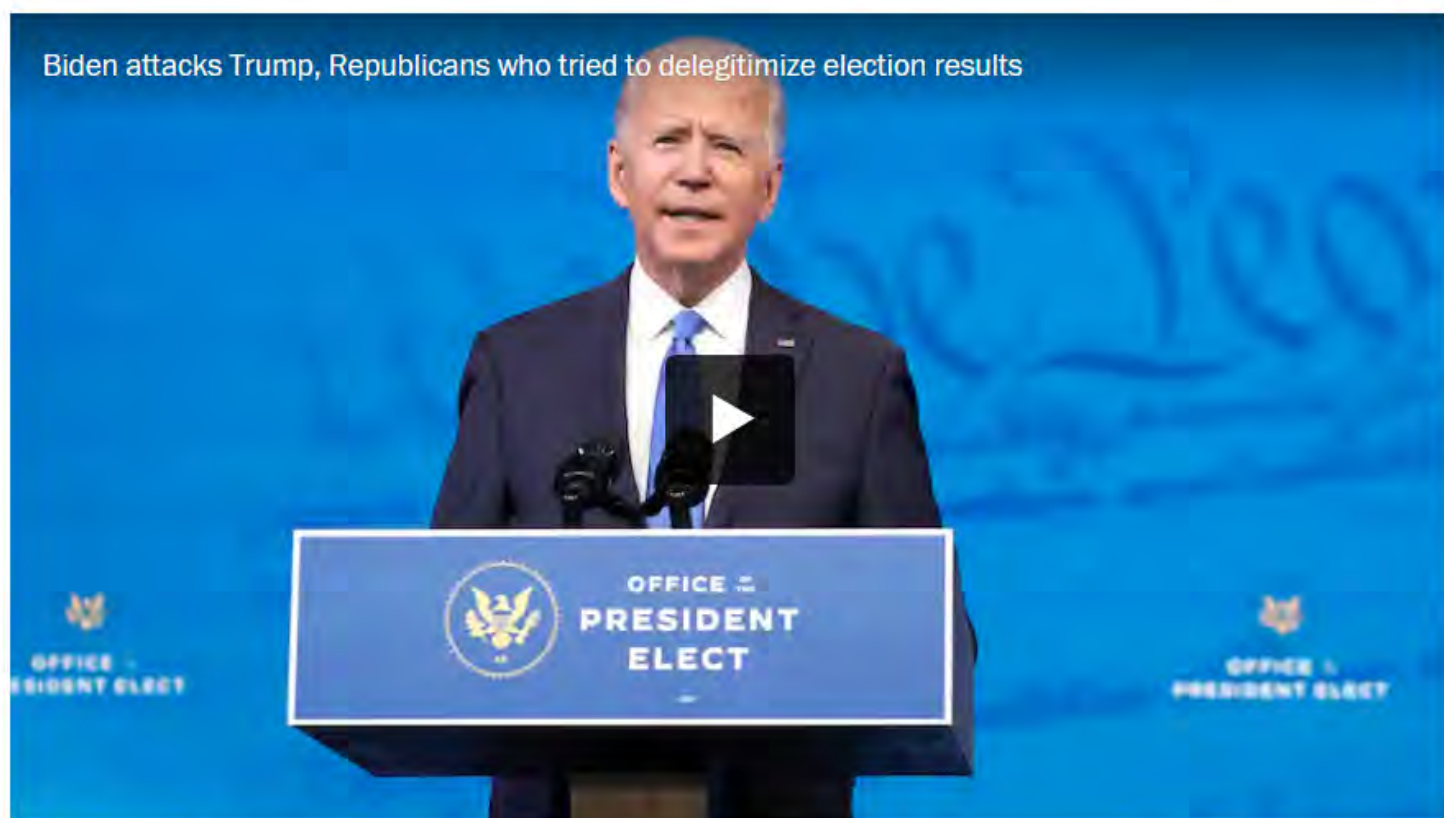
Federal judges have rejected all four of the complaints Powell has filed, two of which — in Wisconsin and Arizona — included Maras-Lindeman's affidavit.

In Wisconsin, a federal judge ruled that Powell's request that the results of the election be overturned is “outside the limits” of the court's power. Attorneys for Gov. Tony Evers (D), in seeking the dismissal, said the complaint was “rampant with wild speculation and conspiratorial conclusions, and simply without any basis in law or fact.”

overturned is “outside the limits” of the court’s power. Attorneys for Gov. Tony Evers (D), in seeking the dismissal, said the complaint was “rampant with wild speculation and conspiratorial conclusions, and simply without any basis in law or fact.”

A federal judge in Arizona wrote that allegations “that find favor in the public sphere of gossip and innuendo cannot be a substitute for earnest pleadings and procedure in federal court” and “most certainly cannot be the basis for upending Arizona’s 2020 General Election.”

Powell has appealed the cases to the U.S. Supreme Court, where she is seeking to have them consolidated.



President-elect Joe Biden attacked Republicans for making baseless claims about the legitimacy of the election on Dec. 14 in Wilmington, Del. (The Washington Post)

Maras-Lindeman, who goes by Tore (pronounced “Tory”), spent recent weeks in Washington with a group of fellow Trump supporters working to bolster Powell’s legal campaign, according to social media posts and statements on her podcast, “Tore Says.” The group included Millie Weaver, a former correspondent for the far-right website Infowars, who released a documentary over the summer — “Shadowgate” — that helped propel Maras-Lindeman to prominence among conspiracy

media posts and statements on her podcast, “Tore Says.” The group included Millie Weaver, a former correspondent for the far-right website Infowars, who released a documentary over the summer — “Shadowgate” — that helped propel Maras-Lindeman to prominence among conspiracy theorists on the right.



Maras-Lindeman told her listeners on Dec. 7 that she was speaking from “the belly of the beast” and that a group of Trump loyalists was working to take action against those who had stolen the president’s victory.

“There are really good people — patriots — gathered, working hard to ensure that they not only get to the bottom of what happened during this election . . . but they’re also seeking to prosecute,” she said.

Maras-Lindeman spent time at Trump’s hotel in downtown Washington and interviewed Patrick Byrne, the millionaire Overstock.com founder and Trump backer [who has said](#) he is funding a team of “cybersleuths” to scrutinize the election. Byrne and Maras-Lindeman told The Post he is not funding her.

In past episodes, Maras-Lindeman has discussed conspiracy theories, including one that baselessly accused high-ranking Democrats of human trafficking centered at a D.C. pizzeria. In an episode last year, she said, “What we realize is that this Pizzagate stuff, this satanic constant abuse of children, is an actual real thing.”

year, she said, "What we realize is that this Pizzagate stuff, this satanic constant abuse of children, is an actual real thing."



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Maras-Lindeman, who is of Greek heritage, joined the Navy in December 1996 and spent eight months training in Illinois and Florida as an airman recruit before departing the service in August 1997, according to a Navy record.

In their civil case, North Dakota state attorneys said that Maras-Lindeman created [a profile](#) on Together We Served, an online veteran community, that incorrectly depicted an extensive military career.

The profile, which is no longer online, said that Maras-Lindeman reached the rank of lieutenant, served in the combat zones of Kosovo, Afghanistan and Iraq, and in the Office of Naval Intelligence, and was awarded multiple medals including a Purple Heart.

In the interview, Maras-Lindeman denied creating the profile and said whoever did had misstated the details of her career. She previously posted to Twitter a purported copy of her Navy separation paperwork, which said that she specialized in communications and intelligence.

Neither the record provided to The Post nor the paperwork Maras-Lindeman posted online stated a reason for her departure, but the papers she posted said that the character of her discharge was "general (under honorable conditions)."

In response to questions about the nature of the discharge, a Navy spokesman referred to the Navy

reason for her departure, but the papers she posted said that the character of her discharge was “general (under honorable conditions).”

In response to questions about the nature of the discharge, a Navy spokesman referred to the Navy Military Personnel Manual. The manual said it means, “The quality of the member’s service has been honest and faithful; however, significant negative aspects of the member’s conduct or performance of duty outweighed positive aspects of the member’s service record.”

In her affidavit, Maras-Lindeman identifies herself as a former “private contractor with experience gathering and analyzing foreign intelligence” and says that from 1999 to 2014 she had responsibility for delegating tasks to other contractors working for the United States and allied nations. She stood by that account in her interview with The Post.

In a court filing in North Dakota last year, she wrote that she had worked as a contractor since 1996 and had been “a vendor with certain programs associated with USSOCOM,” the U.S. Special Operations Command. A spokesman for the command said in an email that its contracting office could find no record of any contract with her.

She claimed in Weaver’s [documentary](#) that, as an intelligence contractor, she carried out a [notorious 2008 intrusion](#) into the State Department’s passport records on several presidential candidates. In a separate podcast interview, she said that she retrieved the records on direct orders from John O. Brennan, who then led a private security firm implicated in the incident and was later CIA director. “I went and got them,” she said. “He told me to go get them.”

A spokesman for Brennan said that Brennan had never heard of Maras-Lindeman.

Maras-Lindeman told The Post that, by its nature, her covert work could not be independently verified. “People like me don’t exist,” she said. “You just have to trust.”

According to a LinkedIn profile that has since been deleted, between 1997 and 2014 Maras-Lindeman obtained eight academic degrees in the United States and the United Kingdom, along with additional professional qualifications. The attorneys in the fraud case said in court filings that they could find records of her earning only one degree, a bachelor’s in biology from the University of Kentucky in 2011.

with additional professional qualifications. The attorneys in the fraud case said in court filings that they could find records of her earning only one degree, a bachelor's in biology from the University of Kentucky in 2011.

Maras-Lindeman told The Post someone else created the profile — despite claims to the contrary by state attorneys in the fraud case — and she declined to comment on its particulars.

After obtaining the degree, Maras-Lindeman and her family moved to Beaverton, Ore.

She took a voluntary job teaching Greek at Agia Sophia Academy, a private Greek Orthodox school in Beaverton. Her [archived biography](#) on the school's website used the title “Dr.” and said she had a PhD. Attorneys for North Dakota later said in a court filing in the fraud case that Maras-Lindeman “is not a doctor and does not possess a PhD from any institution.”

The school's principal, Christina Blankenstein, said in an email that the school could not vouch for Maras-Lindeman's professional record because her position was unpaid. Maras-Lindeman worked at the school for between a year and two years, Blankenstein said.

In the interview, Maras-Lindeman said the school must have misunderstood paperwork she gave them saying that she was a PhD candidate.

After she moved to North Dakota, Maras-Lindeman asserted in series of small claims court cases that she was a pediatric oncologist, attorneys for North Dakota said in a court filing. As recently as November 2017, a [website](#) for a purported cancer research organization named “ML Laboratories” referred to her as “Dr. Tore Maras-Lindeman” and said she was its founder.

Maras-Lindeman also used an email address and Twitter handle identifying herself as “Dr. Lindeman.” She told The Post she reserved the accounts so they would be ready for her when she earned a doctoral degree.

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**Jon Swaine**

Jon Swaine joined The Washington Post's investigative team in 2019. He previously worked for the Guardian from 2014 to 2019 and the Daily Telegraph from 2007 to 2014. Follow [Twitter](#)

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What was your income in 2019?

\$75,000

How many children did you claim as dependents in 2019?

0

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Trump caves — but not before putting the



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All Comments (8.1k)

Viewing Options

Jenny Cook 1 hour ago

All Comments (8.1k)

Viewing Options

**Jenny Cook** 1 hour ago

Wow! Over 8,000 comments? Wonder what the record is for most comments on a single article?

Like Reply Link Report

**Swine_Under_Trump** 4 hours ago

Trump* - The FUBAR unPOTUS

Like Reply Link Report

**Not One of the Promised Virgins** 5 hours ago

Maras_Lindeman should be sued by Dominion, and any school she ever falsified her scholastic qualifications. What nerve. She is a walking talking felonious imposter. And she is doing damage. Sidney Powell will be sued by Dominion, if not already, in the near future. Add this slug Maras-Lindeman, the thief, the liar, the fake everything, to the list.

These tRump supporters really are the scum on top of the scum that floats on the swamp that is called anything tRump. How much more crap are they going to invent in their treasonous quest to invalidate the most secure Presidential election in our country's history? And not because they are patriotic, which their actions are the polar opposite of, but to somehow benefit themselves, their pockets, their relevance.

Some of these people should be in prison, warming the cement ledges they will be calling their beds, learning 50 ways to make Ramen and paying restitution for the rest of their lives. Maras-Lindeman has been doing nothing but being deceitful her whole life. Lock her up. Purple Medal even? Stealing from a Veteran's Charity? She must have gone to tRump University with Eric, Ivanka and Junior, traitor tots, the lot of them.

Like 1 Reply Link Report

**DonniesEscapeSaucerIsOnItsWay** 5 hours ago

Oops. We weren't supposed to know that.

Like Reply Link Report

**HateMeSomeTrump** 6 hours ago

This is a story of the blind and stupid being led by the crazy and goofy.

Like 2 Reply Link Report

**HateMeSomeTrump** 6 hours ago

This is a story of the blind and stupid being led by the crazy and goofy.

Like 2 Reply Link Report

**bonitatibus** 6 hours ago

It's people like Maras-Lindeman who make it so individuals with really do have credentials, expertise, and professionalism are looked down upon and their advice is not followed. It is so sad.

Like 1 Reply Link Report

**Not One of the Promised Virgins** 7 hours ago

Haha! If you're gonna fib, fib big. "...8 months in training as a recruit..". 8 months of wasting tax dollars to train her and then goes bye-bye. Then she lies on resumes, social media, etc how she was a valiant, glowing warrior that slayed enemies of America, lies that she was in Intelligence in the military, and the most egregious of all bs is claiming to be a Purple Heart recipient. Worse than pretending to be a Navy Seal, far worse. To pretend you took a bullet on the battlefield spits in the faces of all the men and women that have. Beyond disgusting, pitiful, pathetic, pathological. Maras-Lindeman is going to have to find other employment soon. Reporting to John Brennan himself, this wanna James Bond. Pitiful.

Add her to the ever growing list of super slugs in tRump's camp. What Dante's Inferno is to hell, the people on this list are to slugs. Roy Cohn, Roger Stone, Rudy Ghouliani, Jeffrey Epstein, Ghiselle Maxwell, Matt Gaetz, Governor Ron DeSantis, Sean Hannity, Mike Pence, Mike Pompeo, Lindsey Graham, Jim Jordan, the moron pillow guy Mike Lindell, Newt Gingrich, Devin Nunes, Rep. Louie Gohmert, the list is epically full of the most amoral, greed/power/relevance driven, will stop at nothing parasite predators.

I'm praying to outlive each and every last one of them.

Like 3 Reply Link Report

**JohnRobVA** 8 hours ago

Terpsichore appears aptly-named – she tapdances like a pro!

Like 1 Reply Link Report

**cheap suit** 10 hours ago

WHERE is Stupid Rudy when we need a good rumor?

Like 1 Reply Link Report

**Suwanee1013** 20 hours ago (Edited)

Exhibit 54

LT Terpsichore Lindeman - Military Timeline

9 kb

ServiceLast Rank
Status Lieutenant
USN
Veteran

ServiceLast NEC
Years CTI-9520-
1996 - Consecutive
2008 Foreign
Language
Translator



Multi National
Security
Transition
Command - Iraq
(MNSTC-I)

2004 - 2008

Rank NEC
Lieutenant90MN
Individual
GWOT
IA/ILO -
Multi-
National
Force



Comments
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DCMA Iraq
Afghanistan

2004 - 2005

Rank NEC
Lieutenant90SP
Junior Individual
Grade GWOT
IA/ILO-
Special
Operations
Support
Team



Service to 2008

2008

Defense
Distinguished
Service Medal

Criteria
The Defense Distinguished Service Medal is awarded by the Secretary of Defense to any military service officer for performing exceptionally meritorious service in a duty of great responsibility with t... [More](#)

Comments
[Comments Pending](#)



2007

Purple Heart

Criteria
The Purple Heart may be awarded to any member of the Armed Forces of the United States who, while serving under competent authority in any capacity with one of the Armed Forces, has been wounded, killed... [More](#)

Comments
[Comments Pending](#)



2007

Afghanistan
Campaign Medal

Criteria
To be eligible for the Afghanistan Campaign Medal, a Service member must be assigned or attached to a unit participating in Operation Enduring Freedom for 30 consecutive days or for 60 nonconsecutive ... [More](#)

Description
[Description Pending](#)



2002 - 2004

NSA Monterey
CA



2 captures

5 Mar 2020 - 1 Nov 2020

IA/ILO-
Special
Operations
Support
Team

Comments
Comments Pending



London UK

1998 - 2002

Rank Location
Lieutenant London -
Junior United
Grade Kingdom

NEC
119X-Unrestricted
Line Officer - Special
Operations (In
Training)

Comments
Show Comments



Combat Action Ribbon

2001

Criteria
The Combat Action Ribbon is a personal decoration awarded to members of the Navy, Marine Corps, and Coast Guard (when operating under the control of the Navy) in the grade of captain (or colonel in th... More

Description
Description Pending



Navy Recruiting Service Ribbon

2001

Criteria
The ribbon is awarded to non-career Recruiting Force and Non-Naval Reserve Canvasser Recruiter personnel upon completion of a successful tour of duty in recruiting at the recommendation of their comma... More

Description
Description Pending



Navy Pistol Qualification Ribbon/Medal

1999

Description
Description Pending

2002 - 2004

NSA Monterey CA

Rank NEC
Lieutenant90IT
Junior GWOT
Grade IA/ILO-
Detainee
Operations
Interrogator

Comments
Comments Pending



2002

Joint Service Achievement Medal

Criteria
The Joint Service Achievement Medal is awarded in the name of the Secretary of Defense to members of the Armed Forces below the grade of colonel (or captain in the Navy) who, while assigned to a joint... More

Comments
Comments Pending



2001

Kosovo Campaign

Criteria
Service members must be bona fide members of a unit participating in, or be engaged indirect support of, the operation for 30 consecutive days in the area of operations or for 60 non-consecutive days ... More

Description
Description Pending



1999

Navy Rifle Qualification Ribbon/Medal

Devices : E

Criteria
The U.S. Navy has issued two marksmanship ribbons: the Navy Pistol Marksmanship Ribbon and Navy Rifle Marksmanship Ribbon, since 1920.



2 captures

5 Mar 2020 - 1 Nov 2020

About this capture

colonel in th... More

Description

Description Pending

**Navy Recruiting Service Ribbon**

2001

Criteria

The ribbon is awarded to non-career Recruiting Force and Non-Naval Reserve Canvasser Recruiter personnel upon completion of a successful tour of duty in recruiting at the recommendation of their comma... More

Description

Description Pending

**Navy Pistol Qualification Ribbon/Medal**

1999

Devices :**Criteria**

The U.S. Navy has issued two marksmanship ribbons: the Navy Pistol Marksmanship Ribbon and Navy Rifle Marksmanship Ribbon, since 1920. The pistol ribbon is currently awarded for qualification on the B... More

Comments

Comments Pending

**NTTC Corry Field, Pensacola, FL (Faculty Staff)**

1997 - 1998

Rank NEC
Seaman 9403-EP-
1st Class 3E
Specific
Electronic
Warfare
Operator

Comments

Show Comments

Criteria

Service members must be bona fide members of a unit participating in, or be engaged indirect support of, the operation for 30 consecutive days in the area of operations or for 60 non-consecutive days ... More

Description

Description Pending



1999

Navy Rifle Qualification Ribbon/Medal**Devices :****Criteria**

The U.S. Navy has issued two marksmanship ribbons: the Navy Pistol Marksmanship Ribbon and Navy Rifle Marksmanship Ribbon, since 1920. The pistol ribbon is currently awarded for qualification on the B... More

Comments

Comments Pending



1998

Officer Candidate School (Pensacola, FL)

School
Officer Candidate School (Pensacola, FL)



1996

Recruit Training (Great Lakes, IL), 912

School
Recruit Training (Great Lakes, IL)

Company
912



Service from 1996

Exhibit 55

STATE OF NORTH DAKOTA

IN DISTRICT COURT

COUNTY OF WARD

NORTH CENTRAL JUDICIAL DISTRICT

STATE OF NORTH DAKOTA EX REL.
WAYNE STENEHJEM,
ATTORNEY GENERAL,

Civil No. 51-2018-CV-01339

COMPLAINT

Plaintiff,

-VS-

TERPSICHORE MARAS, AKA
TERPSICHORE MARIA HELEN
LINDEMAN, AKA TERPSICHORE
LINDEMAN, AKA TERPSICHOR MARAS-
LINDEMAN, AKA TERPSICHORE
MARAS-LINDEMAN, AKA TERPSICHOR
MARAS, AKA TERPSICHORE P
LINDEMAN, AKA TERPSECHORE
MARAS-LINDEMAN, AKA TORE MARAS-
LINDEMAN, AKA TERPSICHOR
LINDEMAN, AKA TERPSECHORE
MARAS-LINDEMAN, AKA TERPSEHORE
P MARAS-LINDEMAN, AKA
TERPSEHORE PETE MARAS-
LINDEMAN, AKA TERPSEHORE
MARAS-LINDEMAN, doing business as A
MAGIC CITY CHRISTMAS and MLLABS
– EVENTS,

Defendant.

CPAT 170233.001

[¶1] Plaintiff State of North Dakota on the relation of Wayne Stenehjem Attorney General, by and through Assistant Attorney General Brian M. Card, Consumer Protection and Antitrust Division, brings this equitable cause of action against Defendant Terpsichore Lindeman, who also uses a large number of variations of her name, see Paragraph 6, *infra*, doing business as A Magic City Christmas and MLLabs – Events, and upon information and belief alleges as follows:

I. INTRODUCTION

[¶2]The State of North Dakota brings this action on the relation of Wayne Stenehjem, the Attorney General of the State of North Dakota, in the public interest pursuant to North Dakota Century Code (N.D.C.C.) ch. 51-15. This action seeks equitable relief, under N.D.C.C. §§ 50-22-05 and 51-15-07, to restrain and enjoin violations of N.D.C.C. chs. 50-22 and 51-15, and to recover property loss suffered by consumers as a result of such violations. Pursuant to N.D.C.C. §§ 50-22-06 and 51-15-10, this action also seeks equitable relief in the form of the recovery of costs, expenses, and attorney's fees incurred by the Attorney General in the investigation and prosecution of this action and, under N.D.C.C. §§ 50-22-05 and 51-15-11, to obtain civil penalties of not more than \$5,000.00 for each violation of N.D.C.C. §§ 50-22-04.3 and 51-15-02. This action also seeks, pursuant to N.D.C.C. § 47-25-07, the cancellation of the trade name "MLLabs – Events" because the registration was obtained fraudulently and for Defendant's use of the trade name to engage in violations of N.D.C.C. chs. 50-22 and 51-15.

II. JURISDICTION AND VENUE

[¶3]Under N.D.C.C. §§ 51-15-07, 51-15-10 and 51-15-11 the district court has jurisdiction to enter appropriate orders.

[¶4]Venue in Ward County is proper under N.D.C.C. §§ 28-04-03 and 28-04-05 because Defendant Terpsichore Lindeman had or has a principal place of business in Ward County, Defendant has transacted business in Ward County, and all or part of the cause of action arose in Ward County.

[¶5]This Court has personal jurisdiction over Defendant. Defendant, either acting directly or by an agent, did one or more of the following: transacted business in North

Dakota; contracted to supply, or supplied, services, goods or other things in North Dakota; committed a tort within or outside North Dakota causing injury to another person or property within North Dakota; committed a tort within North Dakota causing an injury to another person or property within or outside North Dakota; engaged in any other activity within North Dakota; or violated North Dakota law.

III. DEFENDANT

[¶6] Defendant Terpsichore Lindeman ("Defendant" or "Lindeman") is an adult individual and, upon information and belief, is currently residing at, or has a last known address at, 415 11th St. NW, Minot, ND 58703. While principally identified as "Terpsichore Lindeman" by this Complaint and previous filings against Defendant, Defendant uses or has used a large number of aliases, and uses or has used at least three different social security numbers, including:

- a. Terpsichore Maras
 - i. Used in connection with a probable cause affidavit filed by the City of Pittsburgh, Pennsylvania on March 2, 1998; social security number recorded at that time was **REDACTED**¹; and
 - ii. Used by Defendant when she served in the United States Navy from December 1996 until August 1997.
- b. Terpsichor Maras
 - i. Used in connection with a civil lawsuit filed on February 1, 2013 against Defendant in Oregon by Ali Shadbeh.
- c. Terpischor Lindeman
 - i. Used in connection with a civil lawsuit filed on April 27, 2015

¹ See Confidential Information Form, Social Security Number 1.

against Defendant in Oregon by The Hertz Corporation.

d. Terpsichore Maria Helen Lindeman

- i. Used by Defendant to attend the University of Kentucky from 2009 – 2011; social security number used by Defendant at that time was **REDACTED**².

e. Terpsichore Lindeman

- i. Used by Defendant to establish a PayPal account on September 8, 2012; the account was opened jointly with Barry Lindeman, believed to be Defendant's husband; and
- ii. Used by Defendant to establish a PayPal account on May 17, 2016.

f. Terpsichore Maras Lindeman

- i. Used in connection with a civil lawsuit filed on October 2, 2012 against Defendant in Oregon by Meadow Ridge.

g. Terpsichore Maras-Lindeman

- i. Used by Defendant to establish a GoFundMe fundraising account on February 1, 2013;
- ii. Used by Defendant to establish the business Breaking Language Selvedge Solutions, LLC, doing business as BLS Solutions, LLC, filed with the Oregon Secretary of State by Defendant on April 4, 2013;
- iii. Used by Defendant in 2013 when she enrolled in American Military University and attempted masters programs in business administration and psychology; Defendant used Social Security

² See Confidential Information Form, Social Security Number 1.

- Number 1 (see Confidential Information Form) in connection with her enrollment;
- iv. Used by Defendant in connection with fundraising on GoFundMe for the campaign "Impact Protesting," started January 28, 2017; and
- v. Used by Defendant in connection with fundraising on GoFundMe for the campaign "Build That Wall," started May 2, 2017.
- h. Terpsichore Tore Maras Lindeman
 - i. Used in connection with a civil lawsuit filed on December 12, 2012 against Defendant in Oregon by Ali Shadbeh.
- i. Terpsichore P Lindeman
 - i. Used in connection with a criminal case brought against Defendant by the State of Oregon on June 10, 2013;
 - ii. Name used by Defendant to obtain an Oregon driver's license on July 8, 2013 (see Figure 1 below); and
 - iii. Used in connection with a civil lawsuit filed on October 29, 2014 against Defendant by Avid Acceptance, LLC.



Figure 1

j. Terpsechore Maras-Lindeman

- i. Used by Defendant to obtain a Capital One checking account on or before August 22, 2014; Defendant used the social security number **REDACTED**³;
- ii. Used by Defendant to establish a PayPal account on March 31, 2015; Defendant used the social security number **REDACTED**⁴; and
- iii. Used by Defendant on January 1, 2016 to execute a residential lease with Silver Springs Development, Inc.

k. Terpsechore MarasLindeman

³ See Confidential Information Form, Social Security Number 2.

⁴ See Confidential Information Form, Social Security Number 2.

- i. Used by Defendant to establish a PayPal account on October 16, 2015.
- l. Tore Maras-Lindeman
 - i. Used by Defendant to establish an Indiegogo fundraising account on February 26, 2015; and
 - ii. Used by Defendant to establish a PayPal account on November 27, 2017, in connection with her A Magic City Christmas event.
- m. Terpsechore Maras-Lindeman
 - i. Used by Defendant on December 28, 2015 to execute a personal guaranty in relation to a purchase agreement between Silver Springs Development, Inc., Defendant, and Barry Lindeman.
- n. Terpsehore P Maras Lindeman
 - i. Used by Defendant to establish a Gate City Bank personal checking account on October 4, 2016; Defendant used the social security number **REDACTED**⁵;
 - ii. Used by Defendant to file lawsuits in North Dakota against Home Depot, General Electric, AT&T, and Target on December 1, 2016;
 - iii. Used by Defendant to establish a PayPal account on September 22, 2017 to receive proceeds for her A Magic City Christmas event; Defendant used social security number 3 (see Confidential Information Form);
 - iv. Used by Defendant to establish a Gate City Bank account for MLLabs on October 19, 2017 to receive funds received in

⁵ See Confidential Information Form, Social Security Number 3.

connection with her A Magic City Christmas event; Defendant used social security number 3 (see Confidential Information Form); and
v. Used by Defendant to register the trade name "MLLabs-Events" with the North Dakota Secretary of State on December 12, 2017; Defendant used the tax identification number **REDACTED**⁶.

o. T Maras Lindeman

i. Used by Defendant to establish a PayPal account on January 25, 2018.

[¶7] In addition to using a multitude of names and at least three different social security numbers, Defendant uses (or has used) a large number of e-mail addresses, including tml222@uky.edu, dr.t.lindeman@gmail.com, tore@blanguagesolutions.com, terpsichore.lindeman@gmail.com, justtore@gmail.com, drlindeman@midco.net, barry.lindeman@gmail.com, tlindeman@cminterpreters.com, maraslindeman@gmail.com, terpse@mllaboratory.org, and info@magiccitychristmas.com. Defendant has also claimed to use ProtonMail for e-mail communications.

[¶8] Defendant, individually or in concert with others, formulated, directed, controlled, or participated in the acts and practices set forth herein.

IV. NATURE OF DEFENDANT'S BUSINESS

[¶9] Defendant, at all relevant times hereto, was engaged in the business of soliciting and selling merchandise, as that term is defined in N.D.C.C. § 51-15-01, in the State of North Dakota, namely soliciting and selling services, including, engaging in the solicitation of charitable contributions, as the terms "solicitation" and "contribution" are

⁶ See Confidential Information Form, Tax Identification Number

defined in N.D.C.C. § 50-22-01.

V. ACTS OR PRACTICES ALLEGED

[¶10]In connection with the solicitation of charitable contributions in North Dakota, Defendant, prior to solicitation, solicited contributions from persons in North Dakota without registering as a charitable organization or professional fundraiser, in violation of N.D.C.C. §§ 50-22-02 or 50-22-02.1.

[¶11]In connection with the solicitation of charitable contributions in North Dakota, Defendant used deceptive acts or practices, fraud, false pretense, false promise, or misrepresentation with the intent that others rely thereon in connection with the solicitation of a charitable contribution for or on behalf of a charitable organization, in violation of N.D.C.C. § 50-22-04.3.

[¶12]In connection with the solicitation of charitable contributions, or other merchandise as defined as N.D.C.C. § 51-15-01(3), Defendant through written and oral representations made by Defendant, her agents, employees, or representatives, has made untrue, deceptive, and misleading representations, or has engaged in deceptive acts or practices, with the intent that others rely thereon, in violation of N.D.C.C. § 51-15-02.

[¶13]Defendant's conduct in violation of N.D.C.C. §§ 50-22-02, 50-22-02.1, 50-22-04.3, and 51-15-02 includes the following acts and practices listed in paragraphs 14 through 92 of this Complaint:

A. COUNT 1: IN VIOLATION OF N.D.C.C. §§ 50-22-04.3 AND 51-15-02, DEFENDANT SOLICITED DONATIONS FOR THE VICTIMS OF AN APARTMENT FIRE IN HARVEY, ND AND DID NOT USE THE PROCEEDS FOR THIS PURPOSE

[¶14]On or about February 26, 2015, Defendant created a fundraising campaign

on Indiegogo, located at <https://www.indiegogo.com/projects/9-families-who-lost-everything-in-2-hrs-in-a-fire>, ostensibly to raise funds for families that were displaced due to a fire that destroyed a building with apartments in it. Defendant sought to raise \$9,000.00. Defendant organized the campaign using the name "Tore Maras-Lindeman" and the e-mail address justtore@gmail.com.

[¶15]On the campaign page, Defendant stated that the purpose of the campaign was to "raise money to be able to house them [the nine families] at an inn or motel until they can find something." Defendant received 20 donations for a total of \$942.00, \$75.00 of which came from Defendant and Barry Lindeman as three separate \$25.00 donations. Defendant ran this campaign and collected funds to house the families notwithstanding that it was reported that the Artos Motel was making rooms available for the people who lived in the apartments.

[¶16]Despite collecting nearly \$1,000.00, as late as January 22, 2018, Defendant did not disburse the funds to any of the victims of the Harvey fire to "house them at an inn or motel." Likewise, Defendant did not return the donated funds to any of the persons from whom she received donations.

[¶17]Also, as of January 18, 2018, it appeared that, though Defendant had yet to receive from Indiegogo the funds donated to her for the benefit of the Harvey fire victims, Defendant could do so at any time. After the date of January 18, 2018, and as of the date of this Complaint, it is unknown if Defendant received the funds from Indiegogo. Defendant, however, did attempt to collect the funds on at least two occasions prior to January 18, 2018. On May 5, 2015, Defendant sent an e-mail to Indiegogo, using the e-mail address dr.t.lindeman@gmail.com, wherein she stated: "I am super pissed. I log on and I can't find the campaign. I had set up the payment for

these families and nothing... was paid. I come back from my trip and still nothing. I try to log on and I have no campaign." On December 4, 2017, Defendant sent an e-mail to Indiegogo, using the e-mail address justtore@gmail.com, once again requesting the funds, stating: "Please explain where the monies for my closed campaign are. ?? I have emailed you a few times and have received nothing."

[¶18] On January 15, 2018, Defendant sent a third e-mail to Indiegogo, using the e-mail justtore@gmail.com, this time disclaiming a desire to collect the funds, but rather to confirm that the funds were never claimed. Subsequently, Defendant fabricated the entire e-mail below (*Figure 2*) and distributed it online:



Figure 2

[¶19] In violation of N.D.C.C. §§ 50-22-04.3 and 51-15-02, Defendant acted,

used, or employed deceptive acts or practices, fraud, false pretense, false promise, or misrepresentation, with the intent that others rely thereon in connection with the sale or advertisement of any merchandise, specifically the solicitation of donations to house the victims of a February 26, 2015 Harvey, ND fire, and then, as late as three years later, did not use the funds to house the victims of the Harvey fire and did not refund those who donated to her campaign. As late as December 4, 2017, Defendant, as a part of continuing fraud on her part, attempted to collect the funds from her Indiegogo campaign.

B. COUNT 2: IN VIOLATION OF N.D.C.C. § 50-22-02 OR 50-22-02.1, DEFENDANT FAILED TO REGISTER WITH THE SECRETARY OF STATE PRIOR TO SOLICITING CONTRIBUTIONS FOR A CHARITABLE PURPOSE IN NORTH DAKOTA

i. Website solicitations

[¶20]Beginning on an unknown date in mid to late 2017, Defendant began soliciting charitable contributions in connection with A Magic City Christmas, an event that Defendant described as “a benefit concert” that she purported to be organizing. According to Defendant’s website and other advertisements, A Magic City Christmas was to be held on December 22, 2017 at 7:00 p.m. CST.

[¶21]On an unknown date before December 1, 2017, Defendant created a website advertising her A Magic City Christmas event located at www.magiccitychristmas.com. On her website, Defendant advertised that A Magic City Christmas was “A Benefit Christmas Concert.”

[¶22]Using her website, Defendant solicited contributions, within the meaning of N.D.C.C. §§ 50-22-01(3), from consumers for a charitable purpose, within the meaning of N.D.C.C. § 50-22-01(4), by requesting that they “Donate to our Selected Causes.”

Below this solicitation was a link to a PayPal account Defendant created to receive consumer donations located at www.paypal.me/MagicCityXmas. The link was labelled with the words "Donate Now."

[¶23]Defendant's website included a page titled "Charity." On the "Charity" page of her website, Defendant described the charitable purpose of her event to consumers by representing that the A Magic City Christmas event wasn't "just funding our local homeless shelters but the community too!" On that same page, Defendant represented the names and logos of three homeless shelters located in Minot, North Dakota, including the Men's and Veterans' Emergency Homeless Shelter, the Emergency Homeless Shelter, and the Men's Winter Refuge. A "Donate" link on the bottom of the "Charity" page of her website linked to Defendant's PayPal account, above the words, "Every dollar helps those charities keep their doors open." Below that representation, Defendant linked to a store located on her website. At the bottom of the "Charity" page, Defendant listed "Local Beneficiaries," including the Bishop Ryan Catholic School.

[¶24]On the "Store" page of her website, Defendant engaged in the sale of shirts and hats where she further described the charitable purpose of her A Magic City Christmas event and how the proceeds of merchandise sales would be used. Defendant represented that, "Remember proceeds go to the homeless shelters. That's what a great buy is about. Doing good and looking good. You can't beat that!"

[¶25]On the ticketing page of Defendant's website, Defendant further represented the charitable purpose of the A Magic City Christmas event and how ticket proceeds would be used. Defendant represented that, "All proceeds go to select organizations in Minot ND." Defendant further described her A Magic City Christmas event as "A Concert of Giving."

[¶26]At the time that Defendant solicited consumer contributions for a charitable purpose, as described in Paragraphs 20 through 25, *supra*, Defendant was not registered with the North Dakota Secretary of State as either a charitable organization or professional fundraiser and was not in compliance with N.D.C.C. §§ 50-22-02 or 50-22-02.1.

[¶27]On or about December 8, 2017, Defendant updated the “Our Mission” page of her website to state: “In addition, we all knew how the homeless shelter in Bismarck closed down – so we thought we would help support your local homeless shelter with things they need!!!;” “Let’s be clear – this is an event to which WE ARE GIVING AWAY all our PROFITS. That means we are not a charity WE ARE SIMPLY spreading Christmas CHEER!!!;” and “Below are the 3 HOMELESS SHELTERS WE CHOSE TO DONATE OUR PROFITS,” followed by the names of the three homeless shelters in Minot, North Dakota provided in Paragraph 23, *supra*. Defendant’s updated representation further, and more emphatically, describes the charitable purpose of her A Magic City Christmas event. This representation is also starkly different from Defendant’s initial representations that *all* proceeds were intended for homeless shelters and other beneficiaries.

[¶28]Sandwiched between the links to pages on her website where Defendant engaged in the sale of tickets and merchandise, on the “Our Mission” page of her website, Defendant represented that, “Every dollar helps these charities keep their doors open.” Also on that page, Defendant represented that there were other additional intended recipients of proceeds from the A Magic City Christmas event, including the Bishop Ryan Catholic School.

[¶29]At the time that Defendant made the representations described in

Paragraphs 27 and 28, *supra*, Defendant was not registered with the North Dakota Secretary of State as either a charitable organization or professional fundraiser and was not in compliance with N.D.C.C. §§ 50-22-02 or 50-22-02.1.

[¶30] On or about December 6, 2017, Defendant updated the ticket sales page of her website to state that, "ALL PROCEEDS GO TO SELECT ORGANIZATIONS IN MINOT ND THAT THE PERFORMERS CHOSE." At the time that Defendant made this representation, Defendant was not registered with the North Dakota Secretary of State as either a charitable organization or professional fundraiser and was not in compliance with N.D.C.C. §§ 50-22-02 or 50-22-02.1.

ii. Facebook Solicitations

[¶31] On or about September 23, 2017, or on an unknown date prior, Defendant created a Facebook page advertising her A Magic City Christmas event located at www.facebook.com/MagicCityXmas.

[¶32] On or about November 19, 2017, Defendant posted an image to her Facebook page representing that a ticket purchased for the event is a donation. The image represented that, "Your ticket is also your donation."

[¶33] On November 28, 2017, Defendant repeated this representation, stating that a consumer's ticket purchase "for the concert is a donation to the homeless of Minot."

[¶34] At the time that Defendant made the representations described in Paragraphs 32 and 33, *supra*, Defendant was not registered with the North Dakota Secretary of State as either a charitable organization or professional fundraiser and was not in compliance with N.D.C.C. §§ 50-22-02 or 50-22-02.1.

iii. Other Solicitations

[¶35] On or about December 7, 2017, or an unknown date prior, Defendant advertised her A Magic City Christmas event at DakotaMarketplace.com. On Dakota Marketplace, Defendant represented that her event was a “Concert of Giving,” and described the charitable purpose of her event in the following way: “The concert is raising funds for the Women’s and Men’s Homeless shelters and the city of Minot.” Defendant similarly advertised her event, with a link to her website, on the Event Jams website. At the time that Defendant made these representations, Defendant was not registered with the North Dakota Secretary of State as either a charitable organization or professional fundraiser and was not in compliance with N.D.C.C. §§ 50-22-02 or 50-22-02.1.

iv. Defendant admitted engaging in the solicitation of contributions for a charitable purpose

[¶36] In a video posted to Facebook on January 6, 2018, Defendant admitted to the charitable purpose of her A Magic City Christmas event, stating, “No charity here. No charity. **Actually, our profits were going to charities.**” Despite Defendant’s admission that she was soliciting contributions for a charitable purpose, she failed to register as a charitable organization or professional fundraiser and was not in compliance with N.D.C.C. §§ 50-22-02 or 50-22-02.1.

v. Defendant refused to properly register as charitable organization or professional fundraiser

[¶37] Despite recommendations by the Attorney General that Defendant discontinue the solicitation of charitable contributions until she properly registered as a charitable organization or professional fundraiser, Defendant refused to register

appropriately. Defendant did not discontinue the solicitation of charitable contributions until approximately March 1, 2018 when an injunction was ordered pursuant to the Attorney General's Application for Injunction and Order to Compel in Case No. 51-2018-CV-00191. See, Case No. 51-2018-CV-00191, Index # 63.

[¶38] Defendant failed to properly register as a charitable organization or professional fundraiser prior to engaging in the solicitation of charitable contributions described in Paragraphs 20 through 37, *supra*. N.D.C.C. § 50-22-02 states that, "A charitable organization may not solicit contributions from persons in [North Dakota] by any means unless, prior to a solicitation, there is on file with the secretary of state upon forms prescribed by the secretary of state a registration statement ..." N.D.C.C. § 50-22-02.1 states that, "A person may not act as a professional fundraiser subject to [N.D.C.C. ch. 50-22] unless that person has registered with the secretary of state." While engaged in the solicitation of charitable contributions described *supra*, Defendant was not, at any point, in compliance with N.D.C.C. §§ 50-22-02 or 50-22-02.1.

C. COUNT 3: IN VIOLATION OF N.D.C.C. §§ 50-22-04.3 AND 51-15-02, DEFENDANT SOLICITED DONATIONS WHILE MISREPRESENTING ("PASSING OFF") SPONSORSHIP BY THE BANK OF NORTH DAKOTA

[¶39] On or about November 19, 2017, Defendant, while engaged in the solicitation of charitable contributions, posted an image to the Facebook page for her A Magic City Christmas event, located at www.facebook.com/MagicCityXmas, wherein she represented that the Bank of North Dakota was a "local sponsor." The Bank of North Dakota had not agreed to sponsor Defendant's event on or before November 19, 2017. Defendant did not remove the November 19, 2017 representation from Facebook until Defendant deleted the entire Facebook page on or about March 1, 2018.

[¶40] On or about November 30, 2017, Defendant, while engaged in the solicitation of charitable contributions, represented that the Bank of North Dakota was a sponsor on the A Magic City Christmas website, located at www.magiccitychristmas.com. The logo of the Bank of North Dakota appeared under the words “Our Sponsors,” and appeared among other sponsors’ logos that cycled over time. The Bank of North Dakota had not agreed to sponsor Defendant’s event on or before November 30, 2017. In fact, Defendant had been told by e-mail the day before, November 29, 2017, that the Bank of North Dakota had not consented to sponsor Defendant’s A Magic City Christmas event. Defendant had to be told again, on November 30, 2017, that the Bank of North Dakota had not agreed to sponsor Defendant’s event, after the Bank of North Dakota learned its logo was being used on Defendant’s website.

[¶41] On or about December 7, 2017, Defendant, while engaged in the solicitation of charitable contributions, created a fundraising campaign on Fundly, located at www.fundly.com/magic-city-fund, seeking to raise \$40,000.00 for a monument that she otherwise represented was being funded in other ways. See, ¶¶ 87-90, *infra*. On her Fundly campaign page, while engaged in making another misrepresentation, *see* Paragraphs 49-50, *infra*, Defendant continued to misrepresent that the Bank of North Dakota was a sponsor of her A Magic City Christmas event, stating, “**One sponsor the Bank of North Dakota** the ONLY state owned bank. [sic]” The Bank of North Dakota had not agreed to sponsor Defendant’s event on or before December 7, 2017.

[¶42] In violation of N.D.C.C. §§ 50-22-04.3 and 51-15-02, Defendant acted, used, or employed deceptive acts or practices, fraud, false pretense, false promise, or misrepresentation, with the intent that others rely thereon in connection with the sale or

advertisement of any merchandise, specifically the solicitation of donations for her A Magic City Christmas event, while falsely representing (“passing off”) sponsorship by the Bank of North Dakota. Defendant misrepresented this sponsorship on Facebook, her website, and on her Fundly campaign page. Defendant continued to make the representations on Facebook on Fundly for months despite being explicitly told by the Bank of North Dakota that it had not agreed to sponsor her event.

D. COUNT 4: IN VIOLATION OF N.D.C.C. §§ 50-22-04.3 AND 51-15-02, DEFENDANT SOLICITED DONATIONS WHILE MISREPRESENTING (“PASSING OFF”) AN ASSOCIATION WITH THE CITY OF MINOT

[¶43] On or about September 23, 2017, Defendant, while engaged in the solicitation of charitable contributions, posted images to Facebook using the Coin of the City of Minot in the logo for Defendant’s A Magic City Christmas event. The City of Minot had not given Defendant permission to use the Coin of the City of Minot, including as a part of the A Magic City Christmas logo. It was also reported that Defendant was verbally passing off an association with the City of Minot when soliciting sponsors and potential sponsors, including by representing that she was “with” the City of Minot (as opposed to merely *from* the City of Minot).

[¶44] On at least three occasions, on or about October 9, 2017, a representative of the City of Minot attempted to reach Defendant to request that she discontinue use of the Coin of the City of Minot because her use was causing confusion that her event was sanctioned by, or organized in association with, the City. After one voice mail was left regarding Defendant’s use of the Coin of the City of Minot, Defendant sent a follow up text to a City representative stating that she was “on call.” As a result of Defendant’s refusal or failure to communicate with representatives of the City of Minot, and failure to

voluntarily discontinue use of the Coin of the City of Minot, on October 27, 2017, the City of Minot issued a press release disclaiming association with Defendant's A Magic City Christmas event.

[¶45]Well after the City of Minot's efforts to reach Defendant, and the City of Minot's press release, Defendant was still using the Coin of the City of Minot on her website, located at www.magiccitychristmas.com. The Coin of the City of Minot appeared on Defendant's website at least as late as December 5, 2017. Likewise, Defendant's use of the Coin of the City of Minot continued on Facebook until Defendant deleted the Facebook page on or about March 1, 2018.

[¶46]In violation of N.D.C.C. §§ 50-22-04.3 and 51-15-02, Defendant acted, used, or employed deceptive acts or practices, fraud, false pretense, false promise, or misrepresentation, with the intent that others rely thereon in connection with the sale or advertisement of any merchandise, specifically the solicitation of donations for her A Magic City Christmas event, while falsely representing ("passing off") an association with the City of Minot. Defendant misrepresented this association on Facebook and her website for months after Defendant initially made the misrepresentations.

E. COUNT 5: IN VIOLATION OF N.D.C.C. §§ 50-22-04.3 AND 51-15-02, DEFENDANT SOLICITED DONATIONS WHILE MISREPRESENTING RECEIPT OF AN E-MAIL FROM THE BANK OF NORTH DAKOTA THAT SHE FABRICATED OR FALSELY ATTRIBUTED TO THE BANK OF NORTH DAKOTA

[¶47]On or about December 6, 2017, Defendant, while engaged in the solicitation of charitable contributions or sale or advertisement of merchandise, began soliciting funds on GoFundMe, at www.gofundme.com/a-magic-city-christmas, and Fundly, at www.fundly.com/magic-city-fund. Between the two fundraising campaigns, Defendant

sought a total of \$90,000.00. Before being updated, Defendant's GoFundMe campaign sought donations for her A Magic City Christmas event that, as detailed above, was advertised by Defendant as a "benefit concert" to benefit homeless shelters and other beneficiaries. See, ¶¶ 20-36, supra. Defendant's Fundly campaign, meanwhile, was represented as a "Monument Fund," ostensibly for the purpose of funding a monument that Defendant represented was going to be donated to the City of Minot (notwithstanding Defendant's numerous contradictory representations regarding the monument).

[¶48]On or about December 13, 2017, Defendant updated her GoFundMe campaign, *after* receiving a number of donations, to represent that it was raising a "defense fund against [the Attorney General]."⁷

[¶49]In connection with her solicitations on GoFundMe and Fundly, ostensibly intended for her A Magic City Christmas event, legal fees, and to fund a monument, Defendant, in violation of N.D.C.C. §§ 50-22-04.3 and 51-15-02, acted, used, or employed deceptive acts or practices, fraud, false pretense, false promise, or misrepresentation with the intent that others rely thereon in connection with the sale or advertisement of any merchandise, by falsely representing that she received an e-mail from the Bank of North Dakota. See, Exhibit 1. Based upon information and belief, Defendant entirely fabricated the e-mail or falsely attributed it to the Bank of North Dakota to induce others to donate to her A Magic City Christmas event, legal "defense fund," and to fund a monument. It is believed that Defendant fabricated the e-mail or falsely attributed it to the Bank of North Dakota in retaliation because the Bank of North

⁷ It doesn't appear that Defendant ever spent the money she received on legal fees or for her A Magic City Christmas event.

Dakota sent an e-mail to Defendant, with other sponsors and potential sponsors courtesy copied on the e-mail, telling her the Bank of North Dakota had not agreed to sponsor her event.

[¶50] In addition to having fabricated the e-mail, or falsely attributing it to the Bank of North Dakota, Defendant claimed that the e-mail was “recalled” or that an attempt was made to “recall” it, falsely suggesting that the Bank of North Dakota made an attempt to “cover up” the e-mail. Defendant falsely claimed: First, “The e-mail was recalled – we have a snapshot ...;” second, “The email was recalled but we’ve got a copy :) Printed PDF doc instant before it disappeared forever ...;” and third, “The email was recalled but luckily with VPN apps – screen captures happen. Boom it got evil.”

[¶51] As noted above, in Paragraph 18, *supra*, it is known that Defendant has fabricated at least one other e-mail in connection with her activities related to fundraising online. Defendant has also previously altered screenshots from a North Dakota government website and used that altered screenshot to attack the North Dakota Secretary of State. Defendant has also created Facebook pages to either support her claims or attack others,⁸ including the Attorney General’s Office.

[¶52] On or about September 28, 2016, Defendant entered her husband’s information into the “My Polling Place” page of the North Dakota Secretary of State’s website. Defendant then took a screenshot of the result (that provided the polling location associated with Defendant’s husband’s driver’s license information), obscured the result using image editing software, and proceeded to attack the North Dakota Secretary of State on Facebook, claiming that her husband was improperly registered to

⁸ See Paragraph 64, *infra*.

vote in North Dakota.⁹ Apparently attempting to induce others to attack the North Dakota Secretary of State, Defendant, or another person to whom Defendant supplied the altered image, posted the altered image to Reddit.

[¶53] On an unknown date before June 5, 2018, Defendant created a Facebook page entitled “North Dakota Attorney General’s Office.” On or about June 5, 2018, Defendant posted a message wherein she made statements including: “We also got all the communication details we needed but still came up empty so she [Defendant] must hand over more information. We have to find something on her! How do we explain the tax money we’ve been spending on this rather than looking into Seminary’s ACTUAL crimes or solve our CI murder of Alex Sadek (people might think we did it!).”

F. COUNT 6: IN VIOLATION OF N.D.C.C. §§ 50-22-04.3 AND 51-15-02, DEFENDANT USED “SOCKPUPPET” OR “ASTROTURFED” DONATIONS TO INDUCE OTHERS TO DONATE TO HER ONLINE CAMPAIGNS

[¶54] A “sockpuppet” (or “sock puppet”) is “a fake persona used to discuss or comment on oneself or one’s work, particularly in an online discussion group or the comments section of a blog.”¹⁰ “Astroturfing,” meanwhile, is “designed to create the image of public consensus where there is none,” and is used by individuals online to give the impression of widespread support.¹¹

[¶55] Defendant, while engaged in the solicitation of charitable contributions or sale or advertisement of merchandise, and in violation of N.D.C.C. §§ 50-22-04.3 and

⁹ Notwithstanding that North Dakota does not require voter registration.

¹⁰ See, e.g., <https://www.wordspy.com/index.php?word=sock-puppet>

¹¹ See, e.g., Howard, Philip N. (2003). “Digitizing the Social Contract: Producing American Political Culture in the Age of New Media”. *The Communication Review*. 6 (3): 213–45; Cory Doctorow, “HBGary’s high-volume astroturfing technology and the Feds who requested it”, *boingboing*, February 18, 2011; Peter Ludlow, “The Strange Case of Barrett Brown”, *The Nation*, June 18, 2013

51-15-02, acted, used, or employed deceptive acts or practices, fraud, false pretense, false promise, or misrepresentation with the intent that others rely thereon, made or reported donations to her own online campaigns in a manner that had the likelihood and capacity to deceive consumers by giving the impression that her campaigns had greater support than they actually did.

[¶56] On or about December 6, 2017 at 7:58 p.m., Defendant, using the donor name "Magic City Christmas," and the e-mail address info@magiccitychristmas.com, attempted to make a donation to her own GoFundMe campaign for \$100.00. Four minutes later, at 8:02 p.m. on December 6, 2017, Defendant, using the e-mail address terpse@mllaboratory.org, recorded an offline donation in the amount of \$500.00 to her own GoFundMe campaign.

[¶57] As noted above, Defendant gave three \$25.00 amounts to herself in connection with her Harvey fire Indiegogo campaign, including 1) \$25.00, on February 27, 2015, using the barry.lindeman@gmail.com e-mail address; 2) \$25.00, on February 27, 2015, using the e-mail address tlindeman@cmiinterpreters.com; and 3) \$25.00, on February 27, 2015, using the e-mail address dr.t.lindeman@gmail.com.

[¶58] Upon information and belief, Defendant donated to her own campaigns (or recorded offline donations from herself) to give the impression to consumers that she had greater support than she actually did to induce consumers to donate to her. Defendant's deceptive conduct had the likelihood and capacity to deceive anyone who viewed Defendant's fundraising campaigns, and is in violation of N.D.C.C. §§ 50-22-04.3 and 51-15-02.

G. COUNT 7: IN VIOLATION OF N.D.C.C. §§ 50-22-04.3 AND 51-15-02, DEFENDANT SOLICITED DONATIONS WHILE MISREPRESENTING EDUCATION AND EXPERIENCE THAT SHE DOES NOT POSSESS

[¶59]Defendant, while engaged in the solicitation of charitable contributions or the sale or advertisement of merchandise, and in violation of N.D.C.C. §§ 50-22-04.3 and 51-15-02, acted, used, or employed deceptive acts or practices, fraud, false pretense, false promise, or misrepresentation with the intent that others rely thereon, by misrepresenting education and experience that she does not possess, thereby giving the impression to consumers that Defendant had or has the ability and knowledge to organize the A Magic City Christmas event.

[¶60]Defendant has or had a large social media presence, and has created web pages about herself, or added herself to existing webpages, on a large variety of websites, including Wikipedia, Infogram, Voice123, and All Poetry. Almost invariably, Defendant claims experience, education, or accomplishments that she does not possess.

[¶61]On Twitter, Defendant used a Twitter profile with the username "@drlindeman."¹² Defendant, using her @drlindeman Twitter profile, shared posts ("tweets") from a second Twitter account created specifically to advertise her A Magic City Christmas event ("@MagicCityXmas"). Defendant used both Twitter profiles to advertise her GoFundMe and Fundly fundraising campaigns.

[¶62]Based upon information and belief, Defendant is not a doctor and does not possess a PhD from any institution, and Defendant's use of the @drlindeman username in connection with her online fundraising activities has a likelihood or capacity to

¹² This account was suspended by Twitter in June, 2018 for violating Twitter's rules against abusive behavior.

deceive consumers who view her profile and her “tweets” advertising her A Magic City Christmas event and online fundraising campaigns. Defendant also claims to be a member of Mensa International, a “high IQ society,” on her Twitter profile. Mensa International has confirmed that Defendant is not a member of its organization.

[¶63]As suggested, Defendant’s false and exaggerated claims about her education and experience pervade the internet, and represent a persistent effort on Defendant’s part to deceive others.

[¶64]On her LinkedIn profile, that Defendant appears to have recently deleted or hidden from internet searches, Defendant claims¹³:

- a. To be the President and Chair of the Oregon Diversity Council
 - i. The Oregon Diversity Council does not exist, but Defendant created a Facebook page, at www.facebook.com/OregonDiversityCouncil, to give the claim legitimacy. Defendant further claims that the Oregon Diversity Council is associated with the National Diversity Council, and used an altered version of the Pacific Northwest Diversity Council’s logo in fashioning the logo for the supposed Oregon Diversity Council.¹⁴
 - ii. Defendant lists a telephone number for the organization, 503-430-0000, that Defendant answers as “ML Labs.”
 - iii. On or about July 17, 2014, Defendant made a post to her Oregon Diversity Council Facebook page that “Tore Maras-Lindeman MBA, PhD has been appointed as the President and Chair of the Oregon

¹³ The claims below are really only a small sampling of Defendant’s misrepresentations about herself.

¹⁴ As noted *supra*, this is yet another example of how Defendant alters images to engage in fraud.

Diversity Council.”¹⁵

- iv. The Pacific Northwest Diversity Council confirmed to the Attorney General that they have no relationship with Defendant.
- b. To be currently serving as a Cultural Intelligence and Linguistics Officer with the Office of Naval Intelligence from August 1996 to the Present (a total of approximately 22 years)
 - i. Within this span of time, Defendant also claims to have been an active reserve member of the U.S. Navy as an Intelligence Specialist in the Office of Naval Intelligence (August 2009 to June 2013).
 - ii. According to the United States Department of Manpower Data Center, Defendant served in the Navy for approximately eight months, from December 17, 1996 to August 21, 1997.
 - iii. Defendant also claims to have been awarded a Purple Heart, though this claim is dubious if she only served in the military for eight months.
 - iv. Defendant also created a page for herself on the website Together We Served, located at navy.togetherweserved.com, where she claims to have served at a number of duty stations between 1997 and 2008, including serving in Iraq and Afghanistan. She also claims on this site to have attended Columbia University from 1998 – 2001, a claim she does not make elsewhere.
- c. To be doing confidential oncology work for “ML Labs.”

¹⁵ As noted below, Defendant does not possess an MBA or PhD.

- i. ML Labs, or ML Laboratory, is an entity that Defendant claims to operate, while engaged in cancer research, though there is no indication that ML Laboratory or ML Labs exists as anything more than an internet website (previously located at www.mllaboratory.org) that Defendant created to, again, create legitimacy related to her claims of being a cancer researcher and doctor.
- ii. Defendant similarly represented that she is a pediatric oncologist before the North Dakota Small Claims court in case numbers 51-2016-SC-00387, 51-2016-SC-00388, 51-2016-SC-00389, and 51-2016-SC-00390.
- iii. Defendant has also claimed (albeit vaguely) to hold a patent for an invention used in hospitals. The Attorney General has been unable to locate any patent held in Defendant's name(s).
- d. To have been a Clinical Research Assistant at the University of Kentucky College of Medicine from May 2008 to July 2012.
 - i. Please note Paragraph 64(g)-(h), *infra*.
- e. To be certified by the American Translators Association ("ATA") as an interpreter and translator.
 - i. The ATA confirmed that Defendant is not certified as a translator or interpreter through their organization.
- f. To have earned a Masters of Business Administration from American Military University in 2014.
 - i. Though Defendant attempted an MBA program, she has not earned

an MBA from American Military University.

g. To have earned a Master's of Science from the University of Kentucky College of Medicine.

i. Defendant did not complete a Master's of Science in Biology at the University of Kentucky; instead, she only earned a Bachelor's Degree in Biology.

h. To have attended a number of other schools, including Harvard University, University of Indianapolis, London South Bank University, University of Maryland University College, University of East London, Defense Language Institute, and Yale School of Management.

i. The National Student Clearinghouse could only verify that Defendant attended the University of Kentucky, though University of Kentucky records reflect that Defendant attended at least some classes at the University of Indianapolis.

[¶65] On Infogram, located at <https://infogram.com/Tore-Maras-Lindeman>, Defendant makes a number of claims similar to those made by her on LinkedIn. Among many other claims, Defendant claims the following educational accomplishments: Bachelor of Laws (LLB), Electrical Engineering (NEETS or Naval Electrical Engineering Training Series), Associate of Arts in Linguistics, a Bachelor of Science in Psychology, an Associate of Science in Information Technology, a Bachelor of Science in Molecular Biology, a Human Resources certificate, a Doctorate in Cancer Biology, a Master of Science in Cancer Biology, a Master of Business Administration, a Master of Science in Pharmacology, a Graduate Diploma of Law, a Project Management certificate, a Doctorate of Medicine in Medical Science, and a Master of Arts in English. She claims

to have worked or lived in 28 countries, and claims to speak approximately 17 languages. Finally, she claims to have held such positions as a managing director, chief executive, lieutenant commander, consultant, medical student, and hedge fund auditor. As noted above, it appears that the only educational degree Defendant earned is a Bachelor's Degree in Biology, and it appears that Defendant only served approximately eight months in the Navy. Defendant's Infogram claims were linked to her "@drlindeman" Twitter profile when she engaged in the conduct described in Counts 2-9.

[¶66]Defendant, by misrepresenting education and experience that she does not possess, had the likelihood or capacity to deceive consumers, potential sponsors, or any other person from whom Defendant solicited charitable donations or to whom Defendant directed her advertisements or solicited the sale of merchandise. To perpetuate her exaggerated knowledge and experience, Defendant created websites and Facebook pages, and entered her information on a large variety of webpages on the internet. Defendant engaged in violations of N.D.C.C. §§ 50-22-04.3 and 51-15-02 by acting, using, or employing deceptive acts or practices, fraud, false pretense, false promise, or misrepresentation with the intent that others rely thereon, by misrepresenting education and experience that she does not possess, thereby giving the impression to consumers that Defendant had or has the ability and knowledge to organize the A Magic City Christmas event and could be entrusted with the proceeds.

H. COUNT 8: IN VIOLATION OF N.D.C.C. §§ 50-22-04.3 AND 51-15-02, DEFENDANT SOLICITED CONTRIBUTIONS FOR A PURPORTED CHARITABLE PURPOSE AND THEN USED THE PROCEEDS FOR PERSONAL EXPENSES

[¶67]Defendant, while engaged in the solicitation of charitable contributions or

sale or advertisement of merchandise, and in violation of N.D.C.C. §§ 50-22-04.3 and 51-15-02, acted, used, or employed deceptive acts or practices, fraud, false pretense, false promise, or misrepresentation with the intent that others rely thereon, by soliciting contributions from sponsors and consumers while representing that all or some of the proceeds of A Magic City Christmas were intended for charitable purposes, including for homeless shelters¹⁶, and then used the contributions she received for personal expenses.

[¶68]On November 21, 2017, Defendant received a check from KRJ Safety Solutions, LLC ("KRJ Safety Solutions") for \$1,500.00. KRJ Safety Solutions specifically noted on the check that the amount was a "Donation." On that same date, Defendant deposited the \$1,500.00 into the Gate City Bank account she established on October 19, 2017 in the name "ML Labs." Thereafter, and before receiving another check from a sponsor for her event, Defendant made purchases at McDonald's, at Cash Wise Foods, and online via PayPal.

[¶69]On November 22, 2017, Defendant received a \$1,000.00 donation from Newkota Services and Rental, LLC. Defendant deposited the check into her ML Labs Gate City Bank account the same day.

[¶70]In total, as of November 22, 2017, Defendant received \$2,500.00 from sponsors of A Magic City Christmas.

[¶71]Between November 21, 2017 and November 27, 2017, Defendant spent nearly all of this money on a variety of purchases, including purchases at Cash Wise Foods, Marketplace Foods, Wal-Mart, Target, and Facebook, leaving the account with a balance of \$8.94. The only amounts Defendant appears to have actually spent toward

¹⁶ See, ¶¶ 20-35, *supra*.

the A Magic City Christmas event are amounts paid to Crystal Neria (whose stage name is "Kaya Jones"), ranging from \$25.00 to \$750.00, and totaling \$825.00. Therefore, it appears that Defendant spent at least approximately \$1,675.00 of the \$2,500.00 in donations on herself.

[¶72]On November 28, 2017, Defendant deposited a \$1,000.00 donation received from Integrity Outdoor Living, LLC. Immediately afterwards, Defendant withdrew \$500.00 from the account and paid \$510.00 to Crystal Neria.

[¶73]On that same date, November 28, 2017, Defendant issued a check to Phil Shapiro for \$5,000.00, apparently intended for Corey Feldman's appearance at the A Magic City Christmas event. Two days later, on November 29, 2017, this check was rejected by Gate City Bank for nonsufficient funds in the account. (Had the check been cleared, it would have left the account with a balance of -\$4,135.52.)

[¶74]That same date, on November 29, 2017, a check written to Crystal Neria for \$1,000.00 on November 21, 2017 cleared, bringing the account to -\$167.52.

[¶75]On November 30, 2017, Defendant attempted a \$299.02 payment to Progressive Lease that was rejected. This was apparently a personal expense.

[¶76]On November 30, 2017, another payment to Crystal Neria was made, this time for \$500.00. This brought Defendant's ML Labs account to -\$686.52.

[¶77]Defendant's ML Labs account was restored to a positive balance (\$313.48), on November 30, 2017, after depositing a \$1,000.00 donation from United Community Bank.

[¶78]Subsequently, though dated November 30, 2017, the Progressive Lease payment was cleared by Gate City Bank that, after Defendant made a \$212.67 purchase at Target (apparently another personal expense), brought her account

balance down to -\$230.21.

[¶79]On December 4, 2017, Defendant received a return payment of \$500.00 from Crystal Neria that returned Defendant's account to a positive balance (\$205.44), though the reversal of a Popmoney credit of \$500.00 took the account negative once more (-\$325.56).

[¶80]On December 5, 2017, the \$5,000.00 payment to Corey Feldman was attempted again but rejected by Gate City Bank.

[¶81]Subsequently, between December 4, 2017 and January 30, 2018, Defendant's ML Labs account ran a negative balance of varying amounts. While negative, Defendant was charged negative balance fees and still made a handful of purchases for her own benefit, including from QVC.

[¶82]In addition to the deposits described above, and over the same period, Defendant also received various amounts from WePay, the third party processor for PayPal, totaling \$2,608.94. These amounts are believed to be the proceeds of ticket and merchandise purchases by consumers from Defendant through her website. This is unconfirmed because, despite being ordered by the court in Case No. 51-2018-CV-00191, Defendant refused to comply with the court's orders that she fully comply with the Attorney General's subpoenas in the form of Orders to Produce Information which required Defendant to produce payment records related to Defendant's A Magic City Christmas event. As with the amounts received from sponsors, and described above, Defendant spent money received from WePay into her ML Labs account on herself.

[¶83]Beginning December 21, 2017, Defendant made attempts to return \$2,608.94 through WePay. Each attempt between December 21, 2017 and January 30, 2017 was rejected by Gate City Bank due to the negative balance in Defendant's ML

Labs account.

[¶84]Review of Defendant's ML Labs account compared to Defendant's personal account suggests that, as Defendant depleted funds in her personal account, she turned to using funds from the ML Labs account for personal expenditures. Except for payments made to Crystal Neria, and the \$5,000.00 amount that Defendant attempted to pay to Corey Feldman, it does not appear that Defendant ever made any other substantial purchases related to her A Magic City Christmas event. Furthermore, it does not appear that Defendant ever made a single donation to any of the homeless shelters or other beneficiaries that Defendant represented would receive *all* of the proceeds from ticket or merchandise purchases. In fact, Defendant admits the representations she made regarding use of the proceeds¹⁷ were false. According to Defendant (with emphasis added): "The [A Magic City Christmas] event was **not** going to benefit local charities the performers taking part in the event were to benefit other charities and they stated themselves on local, national media and social media. The event's goal was to fund a commemorative monument to the 2011 flood."^{18 19}

[¶85]Defendant admitted to the Minot Daily News that she was using money for personal expenses. The Minot Daily News noted that Defendant said, "I might have been using my own account, but I was tracking every single penny," and Defendant "[said] money taken for personal use was reimbursement for personal funds spent to

¹⁷ See, ¶¶ 20-36, *supra*.

¹⁸ Defendant makes this admission in her Defamation Complaint. See, Case No. 51-2018-CV-00656, Index # 1, ¶ 5, p. 6. Defendant's admission is made as part of a claim that the Attorney General falsely stated, in an April 4, 2018 press release, that her A Magic City Christmas event was supposed to benefit "various charities." Defendant's claim, though not attested, is made under penalty of perjury and purports to be "true and correct" at ¶ 6.1, p. 11.

¹⁹ But note ¶ 36, *supra*, where it is described that Defendant said in a video posted to Facebook that "some of [Defendant's] profits" were intended for production of the monument. See also, ¶ 90, *infra*, where Defendant's numerous contradictory statements regarding the monument are described.

front advertising expenses.” Neither of Defendant’s bank accounts reflects expenditures for advertising, and, as noted above, despite court orders that Defendant provide such records, Defendant has not produced records showing such expenditures.

I. COUNT 9: IN VIOLATION OF N.D.C.C. §§ 50-22-04.3 AND 51-15-02, DEFENDANT SOLICITED CONTRIBUTIONS FOR CHARITABLE PURPOSES AND ENGAGED IN THE ADVERTISEMENT AND SALE OF MERCHANDISE UNDER FALSE PRETENSES

[¶86]Defendant, while engaged in the solicitation of charitable contributions or sale or advertisement of merchandise, and in violation of N.D.C.C. §§ 50-22-04.3 and 51-15-02, acted, used, or employed deceptive acts or practices, fraud, false pretense, false promise, or misrepresentation with the intent that others rely thereon, by soliciting donations from sponsors and consumers while representing that she was going to put on a Christmas benefit concert and donate a “surprise” to the City of Minot, later revealed to be a “commemorative monument.”

[¶87]Beginning on an unknown date before December 1, 2017, Defendant posted to her website, located on the page www.magiccitychristmas.com/charity.html, “Shhhh! It’s a secret! We aren’t just funding our local homeless shelters but the community too! A BIG SURPRISE FOR THE CITY OF MINOT.” This representation was made on December 5, 2017 and December 6, 2017 as well.

[¶88]On December 8, 2017, Defendant updated her website and altered the representation regarding the monument. On the “mission” page of her website, located at www.magiccitychristmas.com/our-mission.html, Defendant represented that, “Cat’s out of the BAG!!! We’ve been forced to spoil the secret!!!! We are donating our profits not only to your charities BUT ... A BIG SURPRISE FOR THE CITY OF MINOT.” Defendant also updated her website to include a drawing of the supposed monument,

with the following stated below (sic throughout):

The performers decided to give the biggest gift of all to the people of Minot. This MONUMENT. A commemorative MONUMENT to the 2011 FLOOD. In addition, we all knew how the homeless shelter in Bismarck closed down – so we thought we would help support your local homeless shelter with things they need!!!

Let's be clear – this is an event to which WE ARE GIVING AWAY all our PROFITS. That means we are not charity WE ARE SIMPLY spreading Christmas CHEER!!! We wanted to keep the MONUMENT a secret ... BUT we couldn't. Cat's out of the bag !!! What do you think about that???

[¶89]In a press release issued by Defendant, she represented that her A Magic City Christmas event “will be raising funds for a ‘secret’ project for the people of Minot, Homeless shelters and other organizations that didn’t qualify for FEMA support due to status when flood of 2011 happened. [sic]”

[¶90]Defendant's representations regarding the monument are numerous and contradict the representations to consumers provided above. Defendant's contradictory representations include: 1) Defendant failed to secure even a fraction of the funding to construct the monument, let alone *donate* it to the City of Minot; 2) Defendant failed to secure the necessary approvals to have the monument donated to the City of Minot or have it placed on public lands; 3) Defendant proffered a contract to a City of Minot official that would have made the City liable for \$200,000 of the \$250,000 cost to have the monument constructed (therefore making it a purchase by the City of Minot, not a donation); 4) Defendant, on GoFundMe, represented that the A Magic City Christmas event was supposed to pay for the monument²⁰, while simultaneously representing; 5) also on GoFundMe, that the *performers* were going to donate the monument to the City of Minot, while; 6) Defendant, on Fundly, was simultaneously soliciting donations to

²⁰ This also contradicts Defendant's other representations that all proceeds were going to benefit homeless shelters, see Paragraph 23-24, *supra*, and, furthermore, Defendant was spending the proceeds on herself.

raise money for the monument, calling it a “Monument Fund;” and, finally, 7) in filings in Case No. 51-2018-CV-00191, Defendant admitted that she planned to have the monument placed on *private land*.

[¶91] Defendant engaged in the solicitations described throughout this Complaint, including in Counts 2 – 8, while representing that Defendant was organizing a benefit concert. In reality, Defendant, as late as December 7, 2017, and a mere two weeks from when the concert was supposed to occur, had not secured basic necessities to hold the benefit concert on December 22, 2017. It does not appear that Defendant ever executed and returned the contract for the venue, the Minot Municipal Auditorium. Also as late as December 7, 2017, Defendant failed to pay for, and failed to execute and return a contract for, sound production for the event. Defendant’s failure to execute and return contracts for the benefit concert’s most basic necessities suggests that Defendant never intended to hold the event, or was otherwise not competent to organize it. Despite her significant failures, Defendant engaged in solicitations related to the event, including soliciting donations from sponsors and engaging in the sale of tickets (that Defendant described as “donations”) to North Dakota consumers. Each sponsorship, ticket, and merchandise sale by Defendants is an individual violation of N.D.C.C. §§ 50-22-04.3 and 51-15-02.

[¶92] Defendant’s actions constituting violations of N.D.C.C. §§ 50-22-02, 50-22-02.1, 50-22-04.3, and 51-15-02 include the following:

- a. Soliciting contributions as a charitable organization from persons in North Dakota by any means without, prior to a solicitation, registering as a charitable organization with the Secretary of State, in violation of N.D.C.C. § 50-22-02.

- b. Alternatively, soliciting contributions from persons in North Dakota by any means without, prior to acting as a professional fundraiser, registering as a professional fundraiser, in violation of N.D.C.C. § 50-22-02.1.
- c. Using deceptive acts or practices, false pretense, false promise, or misrepresentation with the intent that others rely thereon in connection with the solicitation of a contribution for or on behalf of a charitable organization, in violation of N.D.C.C. § 50-22-04.3
- d. Acting, using, or employing deceptive acts or practices, fraud, false pretense, false promise, or misrepresentation, with the intent that others rely thereon in connection with the sale or advertisement of any merchandise, whether or not any person has in fact been misled or damaged thereby, including the solicitation of charitable contributions or the sale or advertisement of merchandise, in violation of N.D.C.C. § 51-15-02.

[¶93]Defendant's actions constitute consumer fraud under N.D.C.C. § 51-15-02.

VI. CONSUMER FRAUD LAW VIOLATIONS
(N.D.C.C. § 51-15-01, et seq.)

[¶94]Plaintiff re-alleges paragraphs 1 through 93 of this Complaint.

[¶95]Defendant engaged in deceptive acts or practices in violation of N.D.C.C. chs. 50-22 and 51-15, for which North Dakota is entitled to relief, including injunctive relief, penalties, costs, expenses, and attorney fees.

[¶96]The deceptive acts or practices alleged in paragraphs 1 through 93 of this Complaint constitute violations of N.D.C.C. chs. 50-22 and 51-15 for which the Court:

- a. May order injunctive relief as provided in N.D.C.C. §§ 50-22-05 and

51-15-07 or as otherwise provided by law;

- b. May order Defendant to pay to the State of North Dakota a civil penalty of up to \$5,000.00 for each violation as provided in N.D.C.C. §§ 50-22-05 and 51-15-11;
- c. Shall order Defendant to pay to the State of North Dakota the costs, expenses, and attorney's fees incurred by the Attorney General in the investigation and prosecution of this action as provided in N.D.C.C. §§ 50-22-06 and 51-15-10, if Defendants are adjudged in violation of N.D.C.C. chs. 50-22 and/or 51-15; and
- d. May order such relief as may be necessary to prevent the use or employment of deceptive acts or practices by Defendant or to restore any loss suffered by persons as a result of the deceptive acts or practices of Defendants as provided in N.D.C.C. §§ 50-22-05 and 51-15-07.

VII. CANCELLATION OF THE MLLABS – EVENTS TRADE NAME
(N.D.C.C. § 47-25-07(3))

[¶97]Plaintiff re-alleges paragraphs 1 through 96 of this Complaint.

[¶98]Under N.D.C.C. § 47-25-07(3), “The secretary of state shall cancel from the register any registration that a district court cancels on any grounds.”

[¶99]The Attorney General believes that Defendant's acts and practices, described in Paragraphs 1 through 96, *supra*, constitute grounds on which the Court should and may cancel Defendant's trade name, “MLLabs-Events” for her use of the trade name to engage in consumer fraud as alleged in this Complaint.

[¶100]Additionally, the Box 9 of the Trade Name Registration or Franchise Name Disclosure form requires the registrant to provide their name and social security

number, if an individual, or the business name and federal tax identification number, if a business. Defendant listed her name but, no doubt because of Defendant's use of multiple social security numbers, provided a federal tax identification number where she should have provided her (actual and correct) social security number.

VIII. REQUEST FOR RELIEF

[¶101]WHEREFORE, PLAINTIFF PRAYS for judgment against Defendant as follows:

- a. That Defendant be adjudged in violation of the consumer fraud law and N.D.C.C. §§ 50-22-04.3 and 51-15-02 for engaging in the deceptive acts and practices alleged in this Complaint.
- b. That Defendant, her agents, employees, representatives, assigns, and all other persons in active concert or participation with her, pursuant to N.D.C.C. §§ 50-22-05 and 51-15-07, be permanently enjoined and restrained from engaging in deceptive acts or practices and from directly or indirectly making false statements, false promises, or misrepresentations with the intent that others rely thereon, in violation of N.D.C.C. §§ 50-22-04.3 and 51-15-02, while engaging in the solicitation of charitable contributions or the advertisement or sale of merchandise, within the State of North Dakota.
- c. That Defendant, her agents, employees, representatives, assigns, and all other persons in active concert or participation with her, pursuant to N.D.C.C. §§ 50-22-05 and 51-15-07, be permanently enjoined and restrained from engaging in the sale of merchandise as defined by

N.D.C.C. § 51-15-01(3), including engaging in the solicitation of charitable contributions.

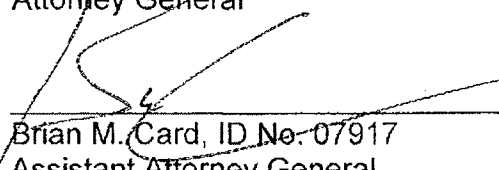
- d. That Defendant, her agents, employees, representatives, assigns, and all other persons in active concert or participation with her, pursuant to N.D.C.C. §§ 50-22-05 and 51-15-07, be permanently enjoined and restrained from soliciting charitable contributions within North Dakota.
- e. That, pursuant to N.D.C.C. §§ 50-22-05 and 51-15-11, Defendant be assessed a civil penalty of up to \$5,000.00 for each violation of N.D.C.C. chs. 50-22 and 51-15.
- f. That, pursuant to N.D.C.C. §§ 50-22-06 and 51-15-10, the Attorney General be awarded and Defendant be ordered to pay all costs, expenses, and attorney's fees incurred by the Attorney General in the investigation and prosecution of this action.
- g. That, pursuant to N.D.C.C. § 51-15-07, Defendant be ordered to pay restitution to all consumers, which have suffered any ascertainable loss, and to restore to any person in interest any moneys or property, real or personal, which may have been acquired by Defendant by means of any practice declared to be unlawful under N.D.C.C. § 51-15-02.
- h. That, pursuant to N.D.C.C. § 47-25-07(3), the Court order the cancellation of the MLLabs-Events trade name for Defendant's use of the trade name to engage in consumer fraud.

- i. That Plaintiff be given such other and further relief as the nature of this case may require and this court may determine to be fair, just, and equitable.

Dated this 2nd day of July, 2018.

State of North Dakota
Wayne Stenehjem
Attorney General

BY:



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Exhibit 56



[extremism](#)

Texas Tea Partiers Are Freaking Out Over 'Deep State' Conspiracy Theories

Here's why the state is ground zero in the right-wing panic over threats to the Trump presidency.



By [John Savage](#)

September 20, 2018, 7:30pm



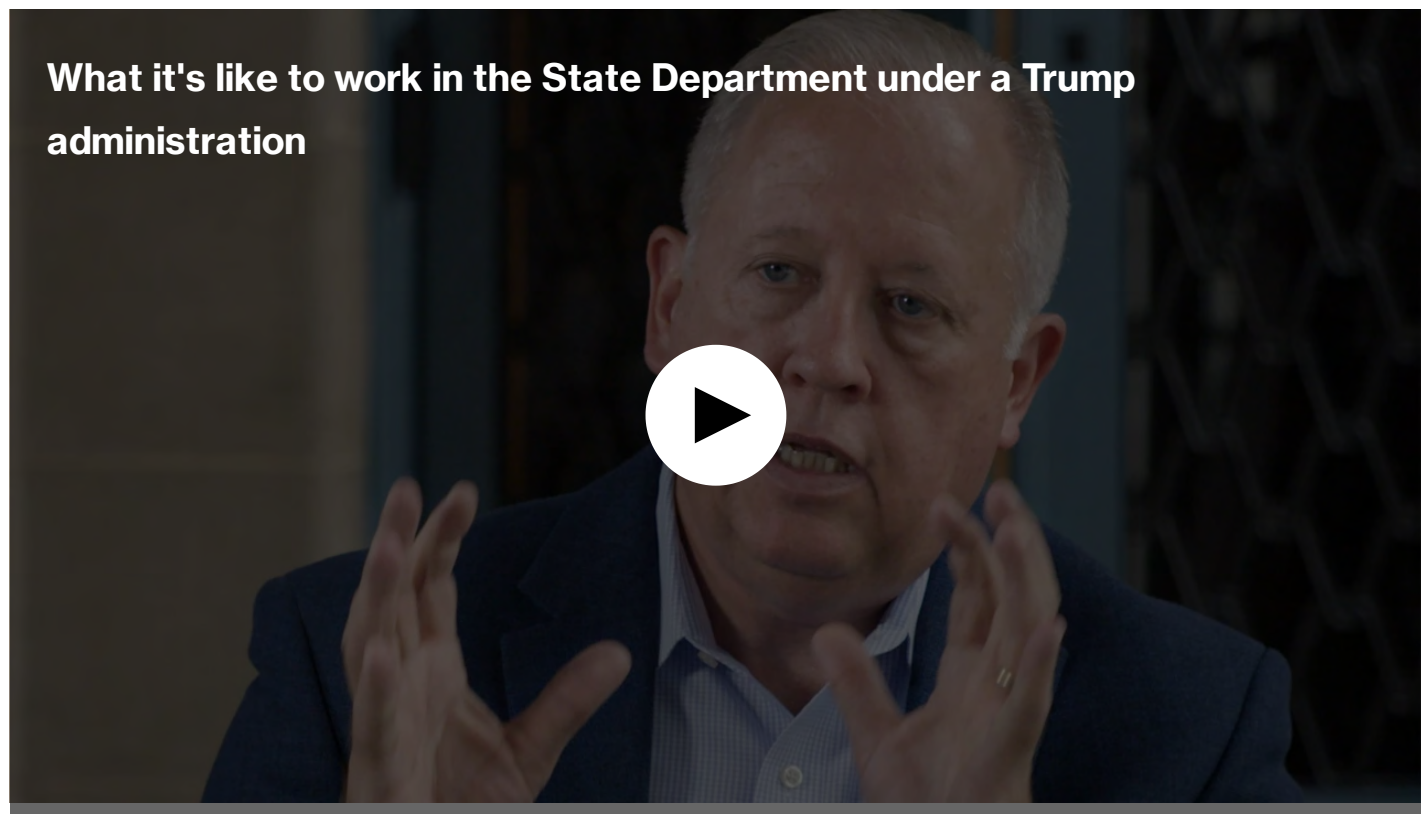
LEFT IMAGE: ALEX JONES (PHOTO BY TOM WILLIAMS/CQ ROLL CALL). RIGHT IMAGE: SEAN HANNITY (SCREENCAP VIA YOUTUBE)

On a blistering hot Tuesday evening in July, about 70 concerned citizens gathered in the Trinity Family Church just off Interstate Highway 20 in the small town of Forney, Texas, about 25 miles east of Dallas. Several people in the all-white group donned shirts

emblazoned with the letters USA and chatted animatedly near the church altar. The national flag, the Texas flag, and the Israeli flag were prominently displayed near the front of the sanctuary.

Members of at least three North Texas tea party-aligned groups, including the Van Zandt County Tea Party, the Kaufman County Tea Party, and the Red Texas Forum, joined a smattering of local political candidates and former elected officials to hear a presentation titled "Historical Roots of the Deep State—What it is and Where it came from." After an opening prayer, Russ Ramsland—a Harvard graduate, CFO of a Dallas-based private security firm, and former candidate for US Congress—wasted no time in laying out the threat posed by the Deep State, which he defined as a secretive, nefarious cabal of government bureaucrats, Islamists, leftists, and establishment Republicans that coalesced in Nazi Germany more than 75 years ago. Deep state actors desperately want to take out President Trump, and true patriots had to act now to save him, Ramsland explained.

Many in the audience nodded vigorously as he spoke.



Since Trump's election, the narrative that a shadowy Deep State was conspiring to destroy his presidency has found receptive audiences across the country. Media outlets such as Fox News and Breitbart News have seized on the idea, and this month, Project Veritas, a right-wing activist group that uses selectively edited undercover recordings to embarrass its targets, has been rolling out a series of videos purporting to "unmask the Deep State." Meanwhile, the *New York Times* recently published an anonymous op-ed by a senior Trump administration official who claimed they and others were actively working to undermine the President, and last week, excerpts from Bob Woodward's new book *Fear* painted a picture of government officials openly mocking and subverting the president. The one-two punch bolstered not only the longstanding right-wing suspicion that anonymous bureaucrats were undermining Trump, but also suggested that his own hand-picked aides were, too.

All of which was likely to reinforce a sense of panic among some Trump supporters, while raising the less unhinged concern in some corners about what it all meant for democracy.

But perhaps nowhere has the most fringe interpretation of the "Deep State" threat resonated more—or for longer—than among Texas Tea Party-style groups. Movement leaders have for some time been spreading the word on a bevy of social media platforms and websites, and speakers like Ramsland have worked feverishly to disseminate the Deep State gospel in grassroots settings. But it's not just a hyper-local thing: In June, Texas Congressman Louie Gohmert railed against the insidious menace on Rush Limbaugh's radio show, and, after the *Times* op-ed was published, Ted Cruz—the fiery Tea Party-standard bearer fending off a challenge from Democrat Beto O'Rourke—could be found blustering about the Deep State with Fox News provocateur Sean Hannity.

While it may not be surprising that anti-government conspiracy theories might have found a foothold in Texas, given its deeply conservative history, it's remarkable that so many of the state's political leaders have taken to actively promoting the theories. And because Texas—a state that contains six of the 20 largest cities in the country, produces the most oil and gas in the nation, and is home to two of the last five Presidents—has been dubbed a useful long-term bellwether for national politics, the situation offers important warning signs for the future.

Ramsland told the assembled citizens in Forney that the Deep State wanted to "denigrate Christianity," to "cripple your children from becoming psychological adults," to "get rid of your Second Amendment rights," and to "get you to emotionally detach from the founding ideals of the country." He added: "Benghazi, the Las Vegas shooting, the whole Confederate monuments [controversy] are part of the cultural revolution that the Deep State wants to have happen."

Dwayne Collins, an affable and trim veterinarian and leader of the Van Zandt County Tea Party, told me he was confident conservatives would heed Ramsland's warning and do their part to bring down the Deep State. "More and more people are becoming aware of the threat," he said.

"The Deep State is real," Collins added, "and they want to take down Trump."

The Deep State is not the Texas far-right's first foray into the alternate universe of conspiracy theories. To take one recent example, on a humid Monday morning in the months leading to the 2016 presidential primary season, an angry crowd of about 150 people marched into a century-and-a-half-old county Courthouse in the small town of Bastrop, Texas. Waiting for them was a Lieutenant Colonel in the US Army, a man the Pentagon had dispatched to allay concerns about a military training exercise set to take place in Texas, and across the Southwest. The military maneuver went by the name Jade Helm 15, but many in the bustling audience were convinced it was something menacing: a covert attempt by the federal government to invade Texas, seize citizens' guns, and possibly imprison the state's conservative residents in abandoned Walmarts.

Austin-based conspiracy theorist Alex Jones had helped ignite the furor, and concerns about the training exercise quickly spread to Texas' robust network of Tea Party groups. Activists promptly reached out to the state's politicians, and Governor Greg Abbott swiftly announced he would deploy the Texas State Guard to monitor the US military's actions. The moment seemed ludicrous to many Democrats and moderate Republicans around the country, but it was a perfect window into Tea Partiers' propensity not only to believe conspiracy theories, but to compel credence from elected officials at all levels.

Texas Tea Party-backed politicians have tended to include some of the most conspiracy-minded elected leaders in the country. There's US Representative Lamar Smith, who accused government climate scientists of engaging in a data conspiracy, and who, in January, charged Google with discriminating against conservatives by blocking users from searching for "Jesus, Chick-fil-A, and the Catholic religion." Google does not block searches for those terms.

There's US Representative Louie Gohmert, who, during a 2017 congressional hearing, displayed a labyrinthine flowchart that connected a host of political bogeymen. The chart linked the so-called "Uranium One" scandal, Hillary Clinton's "secret server," "Benghazi," Deputy US Attorney General Rod Rosenstein, former FBI Director Jim Comey, and Special Counsel Robert Mueller. The chart provided proof, Gohmert claimed, that the investigation into links between the Trump campaign and Russia was ethically compromised.

Texans like Gohmert and his supporters find anti-government conspiracy theories alluring in part because they are in thrall to a mythical reading of the state's history, suggested Cal Jillson, a political science professor at Southern Methodist University in Dallas. Deep in the heart of Texas' mythology rest some widely accepted axioms: the belief that individualism and strict limits on government made Texas great, and the opinion that any outside authority, especially the federal government, was to be regarded with suspicion.

While some Texas politicians may believe the anti-government theories they promote, others are performing for the state's Tea Partiers, Jillson told me. "It varies as you go from politicians like Louie Gohmert, who accepts conspiracy theories as real and at best has a tenuous grasp on reality, to Governor Abbott, who is a shrewd politician and understands the utility of conspiracy theories and the sway they hold with far-right voters in Texas," he said.

During his presentation in Forney, Ramsland detailed the founding of the Deep State—which he said was formed when the Muslim Brotherhood, Prescott Bush (the banker and father of former President George H.W. Bush), leftists, and George Soros came together in Nazi Germany in the 1930s (Soros, who is Jewish, was born in 1930).

"Soros was responsible for finding 400,000 Jews and sending them to the death camps," Ramsland said, falsely. Audience members gasped and shook their heads. (Governor Abbott often invokes Soros in fundraising emails.) Ramsland then directed everyone's attention to a couple of convoluted flowcharts and explained the links between a host of right-wing shibboleths—the Rockefeller family, Soros, Obama, the Clintons, Comey, and Mueller, to name a few.

Ramsey ended his presentation by telling audience members how they could help fight the Deep State: spread the word about the conspiracy; donate to people who support non-Deep State actors, such as groups like Judicial Watch and the Freedom Fund; and demand "that Comey and the others potentially be prosecuted." (Ramsland did not respond to a request for comment.)

But leaving aside Texans' deep-rooted distrust of outside authority—which, after all, could describe plenty of Americans—what else might help explain the state's organized Tea Partiers' willingness to dive so deep down the rabbit hole?

Demographic change and increasing socioeconomic uncertainty have amped up belief in conspiracy theories, according to Chip Berlet, co-author of *Right-Wing Populism in America: Too Close for Comfort*, a book published about two decades ago that seemed to anticipate this current moment, at least to some extent. "Conspiracy theories can be comforting and have found popularity at historical moments when people are unsettled," he told me. And it's no secret that Texas is undergoing massive demographic change: The state is 39 percent Hispanic, and that community has been estimated to outnumber the state's white population as soon as 2020.

Trump has of course effectively embraced conspiratorial thinking in an effort to defend himself from any allegations of wrongdoing, and that may largely remain a matter of political convenience. Likewise, national demographic change—and attendant white anxiety about a perceived loss in cultural clout—has been widely cited as helping explain Trump's rise.

But Texas seems to be experiencing both phenomena on steroids.

For his part, Dwayne Collins, the Van Zandt County Tea Party leader, said he thanked God for Trump, not only because he was doing a fine job as the leader of the free world, but because he understood the breadth and depth of the conspiracy threatening the country—one Texans have been onto for some time.

“I think Trump, with the Tea Party’s help, can stop the Deep State,” he told me.

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Exhibit 57



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Russell James Ramsland Jr.

stated on November 24, 2020 in an affidavit:

In 10 Michigan precincts, voter turnout reached 100% and in 6 precincts it surpassed 100%



MICHIGAN

RUSSELL JAMES RAMSLAND JR.





Voters wait in line to fill out a ballot on the last day of early absentee voting before the general election at the Northwest Activities Center in Detroit, Monday, Nov. 2, 2020. (AP)



By Clara Hendrickson
December 4, 2020

Affidavit in Michigan lawsuit seeking to overturn election makes wildly inaccurate claims about vote



IF YOUR TIME IS SHORT

- Official results from the election show that none of the Michigan voting jurisdictions listed in the affidavit had 100% turnout or higher.
- The affidavit overstates the turnout in these jurisdictions by as much as 10 times

[See the sources for this fact-check](#)

A lawsuit is [asking a federal court](#) in Michigan to force state leaders to disregard Michigan's certified election results and award its 16 Electoral College votes to President Donald Trump. It includes an affidavit that makes wildly inaccurate claims about voter turnout in Michigan cities and townships.

The affidavit comes from Russell James Ramsland Jr., a cybersecurity analyst and former Republican



The affidavit comes from Russell James Ramsland Jr., a cybersecurity analyst and former Republican congressional candidate. Ramsland is the one who [mistook](#) voting jurisdictions in Minnesota for Michigan towns in a separate flawed analysis of voter turnout. His latest analysis correctly names Michigan voting jurisdictions, but similarly arrives at inaccurate voter turnout rates.

For instance, Ramsland claims that Detroit saw a turnout of 139.29%. The [city's official results](#) show that turnout in the city was actually 50.88% of registered voters.

When asked about the error in Ramsland's affidavit, Gregory Rohl, the attorney representing the plaintiffs in the federal lawsuit in Michigan, said he and his team would investigate the data. "I'm always willing to learn and surely want the facts set forth to be accurate in any filing bearing my name," Rohl wrote in an email to PolitiFact Michigan.

Ramsland's analysis gained public attention when a witness shared its inaccurate findings during a state House Oversight Committee hearing in Lansing Wednesday. During the [hearing](#), Rudy Giuliani, Trump's personal attorney, brought a number of witnesses to share allegations of election fraud and misconduct already discredited by election officials and in court. The witnesses included Col. Phil Waldron, who says he's part of a team that looked into "election manipulation." He claimed that "publicly available information" from Michigan analyzed in an affidavit shows



team that looked into "election manipulation." He claimed that "publicly available information" from Michigan analyzed in an affidavit shows excessive voter turnout that indicates election fraud. But the numbers do not square with the statement of votes cast from Michigan counties.

A chart included in Ramsland's affidavit lists 21 Michigan cities and townships, five of which are alleged to have recorded a turnout above 90% in November's election, while 10 purportedly saw turnout of exactly 100% and six surpassed 100%.

Precinct/Township	% Turnout
City of North Muskegon	781.91%
Zeeland Charter Township	460.51%
Grout Township	215.21%
City of Muskegon	205.07%
City of Detroit	139.29%
Spring Lake Township	120.00%
Greenwood Township	100.00%
Hart Township	100.00%
Leavitt Township	100.00%
Newfield Township	100.00%
Otto Township	100.00%
Pentwater Township	100.00%
Shelby Township	100.00%
Shelby Township	100.00%
Weare Township	100.00%
City of Hart	100.00%
Grand Island Township	96.77%
Tallmadge Charter Township	95.24%
Fenton	93.33%
Behemia Twp	90.63%
Zeeland Charter Township	90.59%

It is difficult to imagine that a turnout rate above 100% — let alone 782% in the City of North Muskegon or 461% in Zeeland Charter Township — would have escaped election officials compiling the statement of votes cast. But beyond the implausible turnout rates Ramsland alleges, there are other glaring problems with the list. Shelby Township is named twice. So is Zeeland Charter



implausible turnout rates Ramsland alleges, there are other glaring problems with the list. Shelby Township is named twice. So is Zeeland Charter Township, with two vastly different turnout rates: 90.59% and 460.51%. Ramsland lists "Fenton" without specifying Fenton City or Fenton Township. But the turnout Ramsland lists for Fenton does not match the turnout in either jurisdiction.

The actual turnout statistics reveal the inaccuracy of Ramsland's numbers. His figure for North Muskegon is off by a factor of 10: The actual number is 78.11%, not 781.91%. For Zeeland Charter Township, he inflated the turnout nearly sixfold. For Grout Township and the City of Muskegon, his number is more than triple the correct number.

Figures from Ramsland's affidavit v. Official turnout data

Official turnout data indicates the share of registered voters in the November election who cast a ballot

Precinct/Township	County	Alleged Turnout	Actual Turnout	Alleged Turnout off by a factor of
City of North Muskegon	Muskegon County	781.91%	78.11%	10.01
Zeeland Charter Township	Ottawa County	460.51%	79.81%	5.77
Grout Township	Gladwin County	215.21%	67.23%	3.20
City of Muskegon	Muskegon County	205.07%	55.20%	3.72
City of Detroit	Wayne County	139.29%	50.88%	2.74
Spring Lake Township	Ottawa County	120.00%	78.01%	1.54
Greenwood Township	Oceana County	100.00%	65.50%	1.53
Hart Township	Oceana County	100.00%	65.69%	1.52
Leavitt Township	Oceana County	100.00%	57.78%	1.73
Newfield Township	Oceana County	100.00%	62.30%	1.61



The Poynter Institute

Township	County	Registered	Turnout	Ratio
Leavitt Township	Oceana County	100.00%	57.78%	1.73
Newfield Township	Oceana County	100.00%	62.30%	1.61
Otto Township	Oceana County	100.00%	65.99%	1.52
Pentwater Township	Oceana County	100.00%	82.13%	1.22
Shelby Township	Oceana County	100.00%	37.85%	2.64
Weare Township	Oceana County	100.00%	68.20%	1.47
City of Hart	Oceana County	100.00%	56.66%	1.76
Grand Island Township	Alger County	96.77%	96.77%	N/A
Tallmadge Charter Township	Ottawa County	95.24%	78.89%	1.21
City of Fenton	Genesee County	93.33%	69.80%	1.34
Fenton Township	Genesee County	93.33%	81.56%	1.14
Bohemia Twp	Ontonagon County	90.63%	88.71%	1.02
Zeeland Charter Township	Ottawa County	90.59%	79.81%	1.14

Table: Clara Handrickson -Source: Official county statements of votes cast November 2020 general election-
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There is one location where the actual turnout matches the turnout Ramsland lists: Grand Island Township, a tiny municipality split between an island in Lake Superior and a stretch of the Upper Peninsula's mainland. Turnout there was **96.77%**, according to the official record, as 30 out of the township's 31 registered voters cast a ballot in November's election.

FEATURED FACT-CHECK



Charles J. Cicchetti

stated on December 7, 2020
in a Supreme Court filing

In Wayne County



in a Supreme Court filing

In Wayne County, "174,384 absentee ballots out of 566,694 absentee ballots tabulated (about 30.8%) were counted without a registration number for precincts in the City of Detroit"



By Clara Hendrickson •
December 11, 2020

The 215.21% turnout rate Ramsland listed for Grout Township initially matched the data in the county's statement of votes cast, but that's because there was an error in the report. Gladwin County Clerk Laura Brandon-Maveal explained that the election results certified by the county are accurate, but that the number of registered voters used to compute the turnout rate was incorrect. "We have to hand punch in the total number of registered voters and they put in the wrong number of registered voters," Brandon-Maveal said. The county released a corrected report Dec. 3.

registered voters and they put in the wrong number of registered voters," Brandon-Maveal said. The county released a corrected report Dec. 3.

In a second affidavit Ramsland filed in the same lawsuit Dec. 3, he said that the information source for his first affidavit was data from the state's [open data portal](#) and [Secretary of State's election results page](#) "that no longer exists."

The Secretary of State's office never shared township, city or precinct turnout data on its results page, according to Tracy Wimmer, a spokesperson for the office.

This latest affidavit includes a new list of precincts in another attempt to demonstrate excessive turnout. It shows that "Spring Lake Township, Precinct 6 — B" had a turnout of 120%. Spring Lake Township's clerk said that there's no such precinct. Spring Lake Township Precinct 6 had a turnout of [66.74%](#) in November's election. The list also shows that one precinct in the City of South Haven had a 100% turnout rate. The city's clerk said that there are only eight voters in that precinct, all of whom voted.

Ramsland's new list also showed 33 voting jurisdictions with turnout between 86.79% and 96.77%. An initial review indicated many of these turnout rates are accurate. Michigan had record turnout statewide. President-elect Joe Biden carried the state by [more than 154,000 votes](#).

Our ruling

An affidavit filed in a lawsuit in Michigan seeking



Our ruling

An affidavit filed in a lawsuit in Michigan seeking to overturn the election purports to show turnout rates in Michigan that indicate election fraud.

The numbers do not match the official statement of votes cast in all but one jurisdiction, and many inflate the numbers significantly. The official data show that the number of voters who cast a ballot in November's election did not exceed the number of registered voters in any of the jurisdictions named.

We rate this claim **Pants on Fire!**

Louis Jacobson contributed to this report.



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Russell James Ramsland, Jr., affidavit, King et al v. Whitmer et al, 11/24/20

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Travis Sullivan, City of South Haven Clerk, phone call, 12/4/20

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The Office of the Secretary of State Jocelyn Benson, [2020 Michigan Election Results](#), accessed 12/4/20

Tracy Wimmer, spokesperson for the Office of the Secretary of State, text message, 12/4/20

Browse the Truth-O-Meter

MORE BY CLARA HENDRICKSON



Donald Trump

stated on December 15, 2020 a tweet:

“68% error rate in Michigan Voting Machines. Should be, by law, a tiny percentage of one percent.”



By Paul Egan • December 15, 2020



Russell James Ramsland Jr.

stated on November 24, 2020 an affidavit:

In 10 Michigan precincts, voter turnout reached 100% and in 6 precincts it surpassed 100%



By Clara Hendrickson • December 4,



Mike Duggan

stated on November 29, 2020 an interview:

“Detroit actually has the lowest infection rate in the state of Michigan. We’re half of that of the surrounding suburbs.”





By Paul Egan • December 15, 2020



By Clara Hendrickson • December 4, 2020



By Clara Hendrickson • December 1, 2020

AFFIDAVIT IN MICHIGAN LAWSUIT SEEKING TO OVERTURN ELECTION MAKES WILDLY INACCURATE CLAIMS ABOUT VOTE



YouTube videos

stated on December 26, 2020 in a viral video:



**A registered nurse in
Nashville, Tenn.,
developed Bell's Palsy
after receiving the
COVID-19 vaccine.**



By Daniel Funke • December 30, 2020



Pat Toomey

stated on December 27, 2020 in an interview:

“In my state, as in many other states, we have governors who are closing down businesses again.”



By Jessica Calefati • December 30, 2020



North Carolina Republican Party

stated on December 27, 2020 in a tweet:

North Carolina Gov. Roy Cooper "has not left the Governor's Mansion since the start of the #COVID19 crisis."



By Paul Specht • December 29, 2020



Facebook posts

stated on December 28, 2020 in a video:

The Christmas Day explosion in Nashville, Tenn., was the result of a “missile strike.”



By Daniel Funke • December 29, 2020



Facebook posts

stated on December 29, 2020 in a Facebook post:





Facebook posts

stated on December 29, 2020 in a Facebook post:

News outlets reported that the Nashville bomber died of COVID-19.

By Samantha Putterman • December 29, 2020



Facebook posts

stated on December 27, 2020 in a Facebook post:

The Nashville bombing was an attempt to stop an AT&T audit into Dominion software and cover up election corruption.

By Samantha Putterman • December 29, 2020



Facebook posts

stated on December 28, 2020 in a photo caption:

Cornell University professor Robert Oswald said "COVID-19 was imaginary and fictitious."

By Daniel Funke • December 29, 2020



Facebook posts

stated on December 27, 2020 in social media posts:

Says a recent study found no asymptomatic



posts:

Says a recent study found no asymptomatic or presymptomatic spread of COVID.



By Louis Jacobson • December 28, 2020



Marco Rubio

stated on December 27, 2020 in a tweet:

Says "Dr. Fauci lied about masks in March."



By Jon Greenberg • December 28, 2020



Chuck Calleso

stated on December 22, 2020 in a tweet:

"HIDDEN in the 5,893 page bill that @realDonaldTrump is anticipated to VETO is a provision that says: "Nullifies the President's use of the Insurrection Act."



By Amy Sherman • December 23, 2020

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Exhibit 58

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Report spreads debunked claims about Dominion machines in Michigan county

By ALI SWENSON December 15, 2020

CLAIM: A report released this week in Michigan shows Dominion Voting Systems machines in Antrim County, Michigan, were “intentionally designed with inherent errors to create systemic fraud and influence election results.”

AP’S ASSESSMENT: False. This report rests on falsehoods about a human error in Antrim County and about Dominion machines, according to state and local officials. The initial vote reporting error in Antrim County was isolated and has been identified and explained by election officials. It was caused by a clerk’s failure to update media drives for certain tabulators to reflect the correct ballot content. It was not a machine problem.

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THE FACTS: There is no evidence of widespread fraud in the 2020 election. Election officials have confirmed there were no serious irregularities and the election went well.

There’s also no evidence the election technology firm Dominion Voting Systems switched or deleted votes, used algorithms to unevenly weigh vote tallies, colluded with Democrats, or used foreign servers — despite repeated efforts by the president and his supporters to claim it did.



There's also no evidence the election technology firm Dominion Voting Systems switched or deleted votes, used algorithms to unevenly weigh vote tallies, colluded with Democrats, or used foreign servers — despite repeated efforts by the president and his supporters to claim it did.

Even so, a deluge of false claims around Dominion is circling back to Antrim County, Michigan, this week after [starting there on election night](#), when confusion around a clerk's error drove social media users to falsely blame the election management system used to tabulate the data.

The renewed attention to Dominion and Antrim County this week stems from a report released on Monday as part of a lawsuit seeking to challenge the county's election results.

The 23-page report — signed by a former Republican congressional candidate with a [history of spreading misinformation about Michigan's election](#) — claims Dominion “is intentionally and purposefully designed with inherent errors to create systemic fraud and influence election results.”

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The report claims the results of the election in Antrim County should not be certifiable because a forensic analysis of voting machines found a “machine error built into the voting software designed to create error.”

That analysis is “critically flawed, filled with dramatic conclusions without any evidence to support them,” according to a [joint statement](#) from the Michigan Department of State and the Michigan attorney general's office on Monday.

Antrim County officials concurred in a Tuesday press release, saying, “An analysis which should have been data and fact based is instead riddled with false and unsupported claims, baseless attacks, and incorrect use of technical terms.”

Dominion has clarified that its [technology did not err in Antrim County](#) during the 2020



Antrim County officials concurred in a Tuesday press release, saying, “An analysis which should have been data and fact based is instead riddled with false and unsupported claims, baseless attacks, and incorrect use of technical terms.”

Dominion has clarified that its [technology did not err in Antrim County](#) during the 2020 election. Officials have thoroughly [explained](#) the human mistake that caused the small, Republican-leaning county to temporarily report unofficial results that reflected a landslide win for Joe Biden.

“It was prompted by the clerk not updating media drives in some of the machines in Antrim County, an accidental human error,” the Michigan Department of State said in a [release](#). “Reporting errors are common, and always caught and corrected in the county canvass, if not before, as was the case in Antrim County.”

“There was no malice, no fraud here, just human error,” County Clerk Sheryl Guy told the AP. The tabulation error was corrected.

Several social media users, including Trump attorney Rudy Giuliani and the president himself, have cited the report’s mention of the county having a “68% error rate,” which it claims is based on a review of tabulation logs from three days after Election Day.

The report’s authors didn’t explain all the errors they saw, or what they mean by “error rate.” County officials told the AP they didn’t understand the number, since they have not had a chance to look through the data.

The report released Monday also included a slew of other debunked claims about Dominion, which Dominion CEO John Poulos addressed at length on Tuesday in prepared statements to a Republican-led Michigan Senate committee investigating the election.

“The disinformation campaign being waged against Dominion defies facts or logic,” Poulos said. “To date, no one has produced credible evidence of vote fraud or vote switching on Dominion systems because these things simply have not occurred.”

Upon the release of the report on Monday, Michigan Secretary of State Jocelyn Benson called the state’s Nov. 3 election “the most secure in our state’s history.”

“If the Trump campaign had any actual evidence of wrongdoing – or genuine suspicion thereof – they could have requested a hand recount of every ballot in the state,” she said in a statement. “They did not, instead choosing to allow shadowy organizations claiming expertise to throw around baseless claims of fraud in an effort to mislead American voters and undermine the integrity of the election.”

For further confirmation nothing went awry with vote tabulators in Antrim County, the Michigan Bureau of Elections will complete a risk-limiting audit of all ballots there this Thursday, according to the Michigan Department of State.

“This is essentially a hand tally of every ballot, which can be compared with the



For further confirmation nothing went awry with vote tabulators in Antrim County, the Michigan Bureau of Elections will complete a risk-limiting audit of all ballots there this Thursday, according to the Michigan Department of State.

“This is essentially a hand tally of every ballot, which can be compared with the machine-tabulated results,” the department said in a [statement](#).

“We’re interested in transparency here,” Antrim County spokesman Jeremy Scott told the AP. “Even though we’re confident in the results, we want everybody to be confident in the results.”

—

This is part of The Associated Press’ ongoing effort to fact-check misinformation that is shared widely online, including work with Facebook to identify and reduce the circulation of false stories on the platform.

Here’s more information on Facebook’s fact-checking program:

<https://www.facebook.com/help/1952307158131536>

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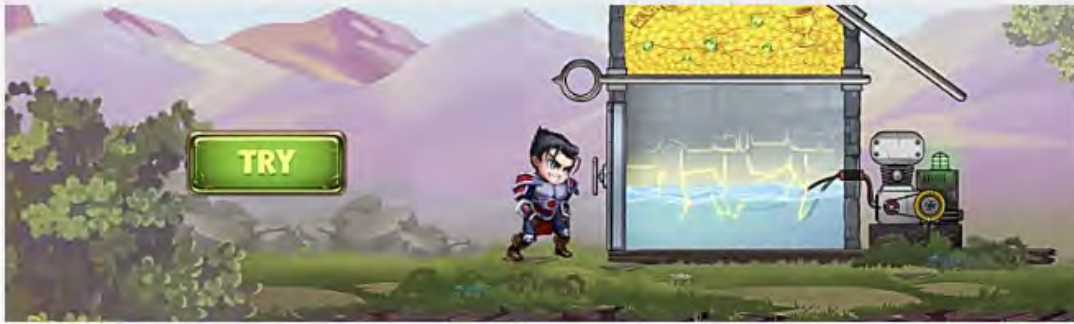


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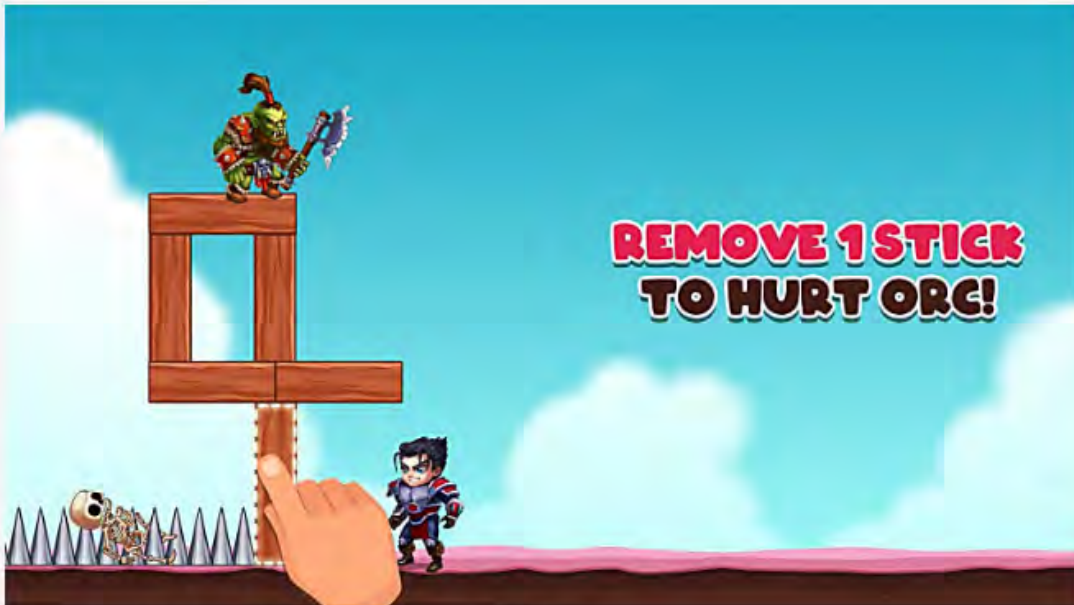
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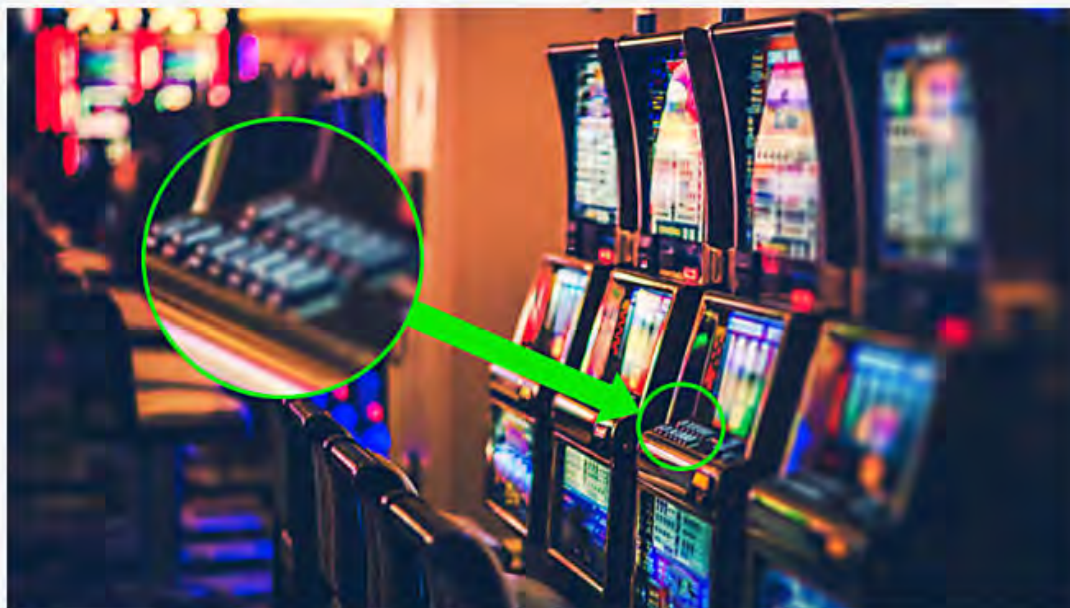
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ELECTIONS

Former election security chief for Trump knocks down Antrim County report

Todd Spangler Detroit Free Press

Published 1:40 p.m. ET Dec. 16, 2020 | Updated 5:31 p.m. ET Dec. 16, 2020

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Pro-Trump rally in Washington, D.C. includes arrests, stabbings

Supporters of President Donald Trump's unfounded voter fraud claims in the District of Columbia clashed with counter-protesters. [USA TODAY](#)

A former Trump administration official who oversaw election security and was ousted after saying there were no widespread problems on Wednesday pointed out problems with a report claiming irregularities in Antrim County and cited as proof of corruption by President Donald Trump and others.

Testifying before the Senate Homeland Security and Governmental Affairs Committee, Chris Krebs, the former chief of the Department of Homeland Security's Cybersecurity and Infrastructure Security Agency, called the report by Allied Security Operations Group throwing doubts on the election systems used in Antrim County "factually inaccurate."

"It implies those systems are undependable," said Krebs, who explained that he went over

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and Infrastructure Security Agency, called the report by Allied Security Operations Group throwing doubts on the election systems used in Antrim County "factually inaccurate."

"It implies those systems are undependable," said Krebs, who explained that he went over the report the group issued as part of a lawsuit questioning the vote results in the county that has been used by Trump and his allies to widely suggest corruption. He said he could find nothing in it to support those claims.

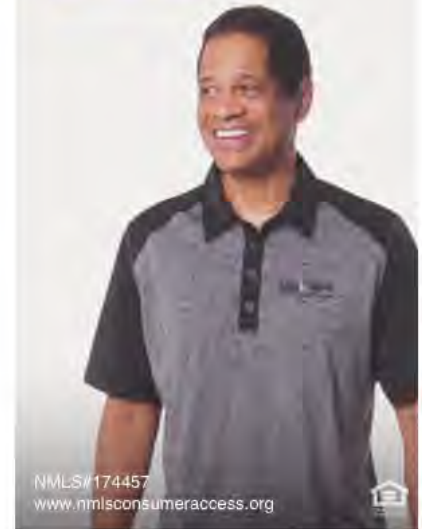
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The Free Press, which has been following the Antrim County case, has looked closely at the Allied Security Operations Group report, which claims the county's equipment supplied by Dominion Voting Systems was "intentionally and purposefully designed with inherent errors to create systemic fraud and influence election results." In those reports, the Free Press has concluded that some of its claims — including one that suggested machines had a 68% error rates if that percentage of the county votes had been misread, left untallied or changed — [were false or misleading](#).

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Krebs said when he went over the report he was thrown by that claim of a 68% error rate and he saw it "repeated in social media by the (Trump) campaign, by the president." But as he looked more closely, he concluded that the number cited by the group is the number of alerts reported by the voting machines or tabulators, not necessarily errors or changes in the actual ballots as they were counted.

"That's being used to spin that the machine itself is not reliable," Krebs said.

The tabulators used in Antrim County were certified by the Election Assistance Commission, which requires that voting systems meet certain error thresholds for the computer code that runs the systems.

The former acting director of the EAC's Voting System Testing and Certification Program, Ryan Macias, said the report showed "a grave misunderstanding" of the voting system used in Antrim County as well as "a lack of knowledge of election technology and process." The report, as a result, "has come to a preposterous conclusion," Macias said.

Krebs also said that a photo he inspected from the report, which purported to show vote tampering and an effort to "zero out election results," appeared to him as nothing more than a "placeholder" in a line of code in Dominion's programming system. He noted that these are Windows-based machines and he worked at Microsoft.

"It's a placeholder for a parameter," Krebs said. "It may be that it's just not good coding. But it certainly doesn't mean that someone tried to get in there and hit 0.

"They misinterpreted the language ... and that's just one example," Krebs said.

Krebs said efforts to try to undermine the integrity of the election could have a long-term effect and need to stop, given that no evidence of widespread problems has been found despite allegations by Trump and his supporters.

"I'm seeing these reports that are factually inaccurate continue to be promoted," he said. "We have to stop this. It's undermining confidence in democracy."

Clara Hendrickson contributed to this report

Contact Todd Spangler attspangler@freepress.com. Follow him on Twitter [@tsspangler](https://twitter.com/tsspangler). Read more on [Michigan politics](#) and sign up for [ourelections newsletter](#).

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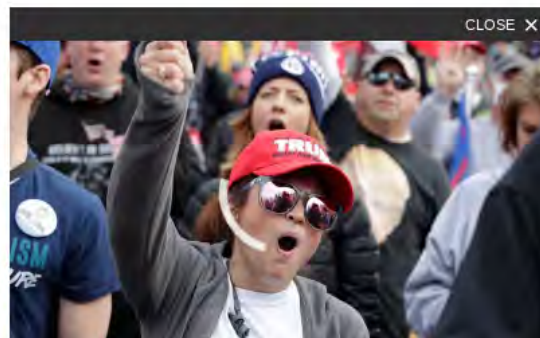
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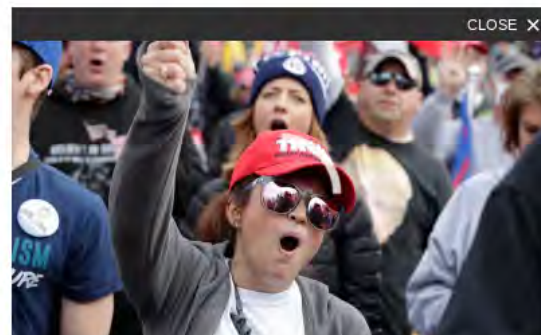
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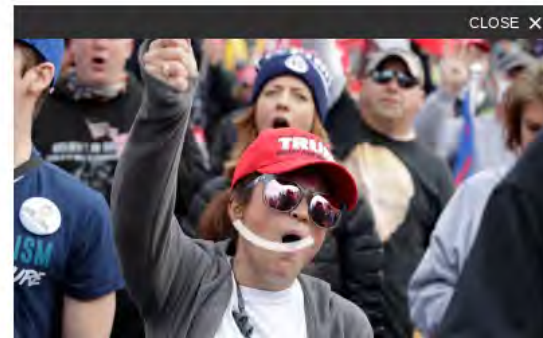
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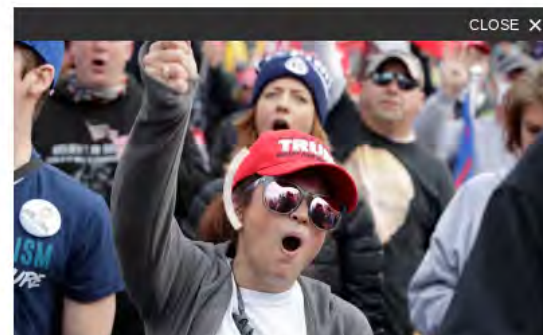
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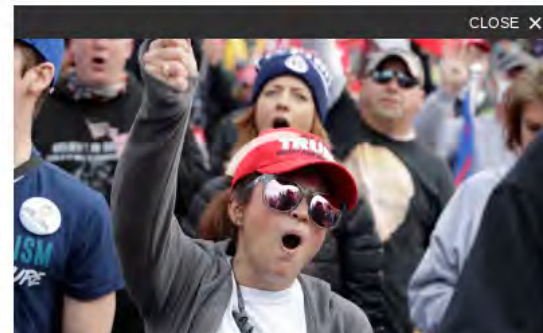
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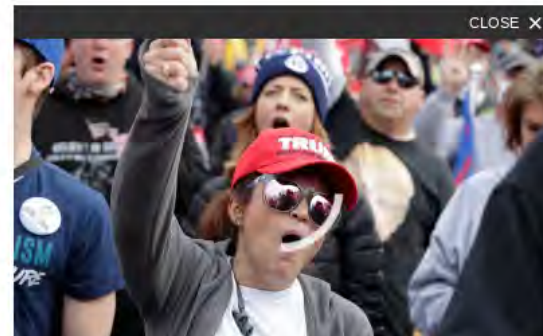
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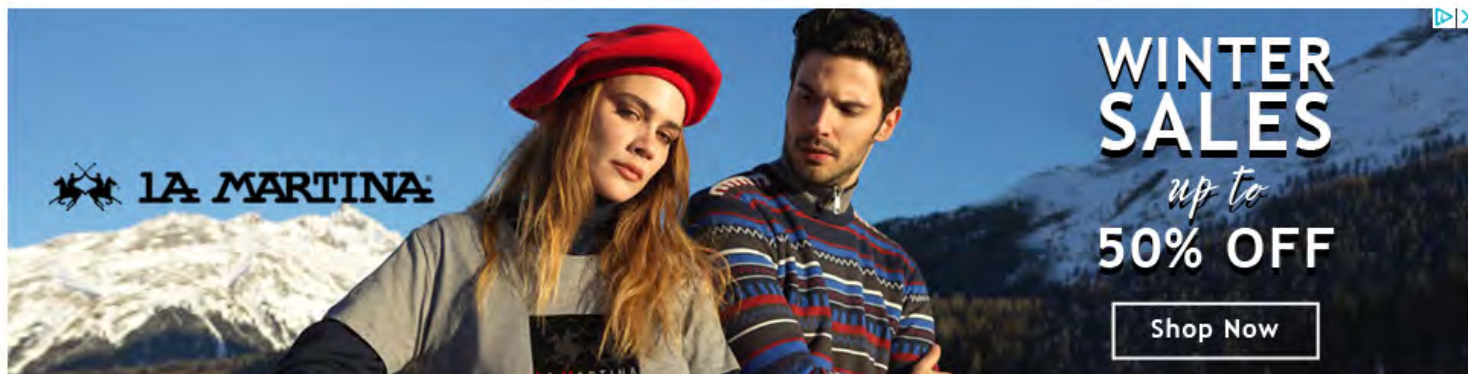
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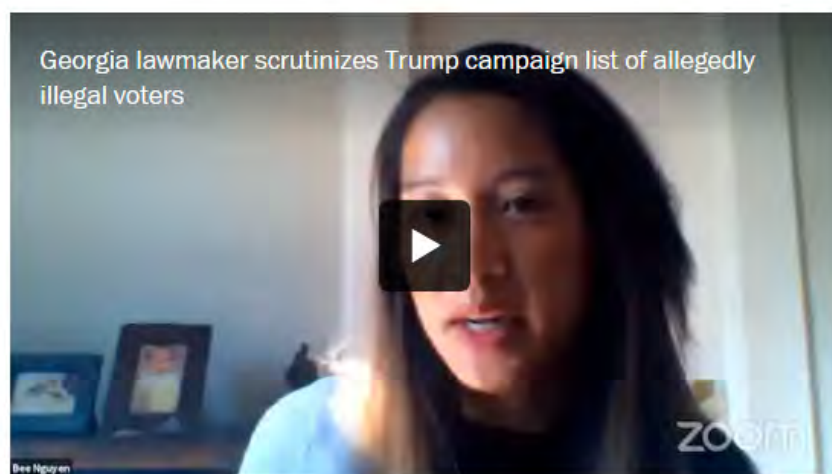
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Politics

Here's what happened when a Georgia lawmaker scrutinized the Trump campaign's list of allegedly illegal votes



Georgia state Rep. Bee Nguyen (D) fact-checked a list of voters who President Trump's campaign claimed cast illegal ballots during a hearing on Dec. 10. (The Washington Post)

By [Michelle Ye Hee Lee](#)

Dec. 11, 2020 at 12:17 a.m. GMT

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When Georgia state Rep. Bee Nguyen (D) reviewed a list of





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By **Michelle Ye Hee Lee**

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When Georgia state Rep. Bee Nguyen (D) reviewed a list of voters who President Trump's campaign claimed cast illegal ballots in the state, three names caught her eye: two friends and a constituent.

For days, Nguyen pored over public records, spoke with voters by phone and even knocked on doors in person to vet the Trump list. She found that it included dozens of voters who were eligible to vote in Georgia — along with their full names and home addresses.

On Thursday, when a data analyst who compiled the list told a panel of state lawmakers that it proved thousands of voters cast ballots in Georgia who should not have, Nguyen was ready.

"I do want to share with you some of the things that I found that appeared to be incorrect to me," the two-term lawmaker told Matt Braynard, whose research [has been cited](#) in numerous suits filed by Trump and his allies, several of which have been tossed out of the courts.



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Nguyen's 10-minute dissection of the data offered a rare real-



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Nguyen's 10-minute dissection of the data offered a rare real-time fact check of the unsubstantiated claims of widespread fraud that the president's allies have promoted in state hearings around the country, largely before friendly Republican audiences.

"If you are going to take the names of voters in the state of Georgia and publish their first, middle and last name, their home address, and accuse them of committing a felony, at the very minimum there should have been an attempt to contact these voters," she said in an interview after the hearing. "There was no such attempt."

Braynard said in an email to The Washington Post that he "appreciated her feedback and look forward to getting her records that are questionable. I was happy to make a statement and happy to hear feedback and questions."



The episode shows how quickly the allegations by Trump and his supporters have fallen apart under scrutiny, particularly in the courts, which have consistently rejected assertions that rampant irregularities tainted the vote.

[Election results under attack: Here are the facts]

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Pence's very limited options to challenge Biden's win

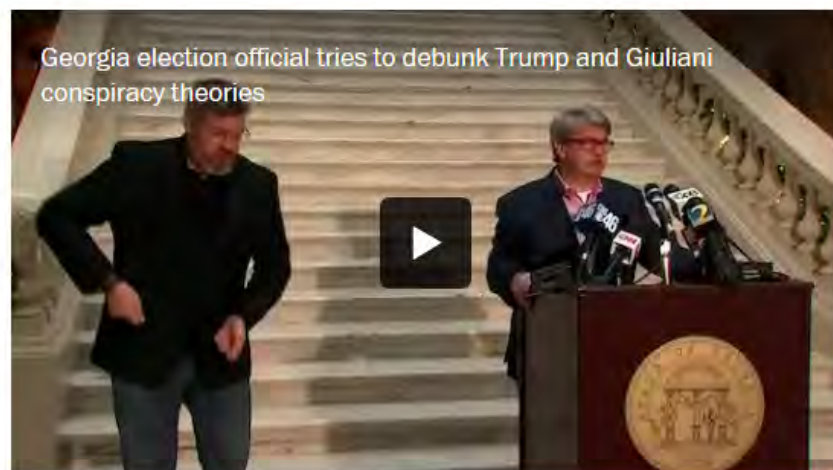


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in the courts, which have consistently rejected assertions that rampant irregularities tainted the vote.

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Georgia Voting Systems Manager Gabriel Sterling expressed his frustration on Dec. 10 with conspiracy theories about the 2020 election. (The Washington Post)

Yet in Georgia and elsewhere, many state Republicans have given Trump a platform to air the claims, holding legislative hearings on election integrity that have largely been used to recycle conspiracy theories and unsubstantiated allegations.

The president's lawyer, Rudolph W. Giuliani, appeared via video at the Georgia House's investigative hearing into the election on Thursday, a day after being discharged from the hospital due to a [coronavirus](#) infection. During his testimony, Giuliani reiterated several claims that state election officials have repeatedly debunked since Election Day.



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All 457 residents' IQs from highest to
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Giuliani called out several Black election workers in Fulton County, alleging that they were “passing around USB ports as if they were vials of heroin or cocaine.” He also referred to some election workers by name while questioning their actions — [despite repeated pleas](#) from state election officials to protect the safety of election workers.

The president’s legal team also questioned the security of the voting machines used in Georgia, repeating a widely debunked conspiracy theory.

At one point, as the lawyers played a video of an election official in Coffee County, Ga., Giuliani was heard saying off-camera: “This is really good stuff,” adding: “We should try to get this on Newsmax, on OAN,” referring to conservative media outlets.

House Governmental Affairs Committee Chairman Shaw Blackmon, a Republican, did not offer an opportunity for lawmakers to question Giuliani.



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The forum was sharply criticized by officials with the secretary of state's office, who have defended the integrity of the election and denounced efforts to undermine public faith in the outcome.

"Giving oxygen to this continued disinformation is leading to a continuing erosion of people's belief in our elections and our processes," Gabriel Sterling, Georgia's voting information systems manager, said during a news conference Thursday afternoon.

Georgia certified its election results for the second time this week after a second recount of presidential ballots reaffirmed Joe Biden's narrow victory in the state.



A cardboard cutout of President Trump is held up during a victory rally Saturday in Valdosta. (Jabin Botsford/The Washington Post)

But the legal challenges have not abated. The Republican National Committee filed a lawsuit Tuesday claiming that some poll watchers could not observe the vote counting as closely in person as it had hoped, and challenging the use of

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But the legal challenges have not abated. The Republican National Committee filed a lawsuit Tuesday claiming that some poll watchers could not observe the vote counting as closely in person as it had hoped, and challenging the use of ballot drop boxes, which were installed at the direction of election officials in Georgia.



Obama's IQ Vs Trump's IQ

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In another lawsuit filed in recent days, the Trump campaign and Georgia Republican Party Chairman David Shafer alleged systemic irregularities and requested that the court decertify the election and prevent the state's electors from casting their votes for Biden when the electoral college meets on Monday.

Legal experts said the court challenges have little hope of success.

"It seems, in any event, to be much ado about nothing," said John Powers, a Georgia analyst at the voting rights group Lawyers' Committee for Civil Rights Under Law. "It's not clear what the end game is here, but it's never been clear to me that there is a discernible end game."

The Trump campaign's 1,585-page lawsuit relies heavily on data analysis by Braynard, who worked on the Trump campaign in 2016 and [who has led an outside effort to](#)

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The Trump campaign's 1,585-page lawsuit relies heavily on data analysis by Braynard, who worked on the Trump campaign in 2016 and [who has led an outside effort](#) to analyze voter records and other databases in search of signs that ballots may have been cast illegally.

[The federal government's chief information security officer is helping an outside effort to hunt for alleged voter fraud]

"When just combining my findings alone, the number of ballots that are strongly indicated as illegally cast surpasses the margin of victory in the presidential election, thus making it impossible to know who the deserved winner is in Georgia," Braynard said during the hearing.

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He provided lists of voters' personal information to back up his claim that there were thousands of individuals who had voted but were registered in another state. He said the lists showed voters who used a post office address to mask their true residences and that others voted in two states.

During the hearing Thursday, Nguyen countered Braynard's analysis with her own research, based on a sampling of the exhibits included in the lawsuit.

Of the first 10 names on the list that were allegedly out-of-

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analysis with her own research, based on a sampling of the exhibits included in the lawsuit.

Of the first 10 names on the list that were allegedly out-of-state voters, Nguyen said she found eight who were longtime Georgia residents and property owners by using public records.

Dozens of voters who the campaign suggested used P.O. boxes to vote illegally were actually residents of a single condominium building that had a mail center on the first floor — including Republicans and Democrats, she said.

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“I wanted to do the research because these are real-life people and we cannot just be alleging that they are committing voter fraud and that they are committing a felony and not do our due diligence,” Nguyen said later.

Nguyen, who in 2017 filled the state legislative seat vacated by Stacey Abrams when she ran for governor, said the voters she contacted said they were not aware that their names and addresses were made public in the lawsuit.

After she presented her findings during the hearing, Braynard thanked Nguyen for her research.

“I actually want to thank you for helping to raise issues to

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After she presented her findings during the hearing, Braynard thanked Nguyen for her research.

“I actually want to thank you for helping to raise issues to help better validate data,” he said. “It’s only with strong scrutiny that we’re able to be completely confident in our findings.”

Aaron Schaffer contributed to this report.

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Michelle Lee

Michelle Ye Hee Lee is a reporter on The Washington Post's national political enterprise and accountability team. Follow 🐦

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**SilkkyFire** 2 weeks ago

I have always thought we were a nation in need of reform. We always have been. (Human beings are always in need of reform.)

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Exhibit 61



Today's Refinance Rate

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APR 15 Year Fixed | \$300K

Select Loan Amount

\$225,000

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2020 ELECTIONS

Pro-Trump legal crusade peppered with bizarre blunders

Spelling errors, misplaced states and client mix-ups are the main results so far of Sidney Powell's legal efforts to overturn the election.



Attorney Sidney Powell's mythology has gained traction with a slice of the MAGA orbit. | Ben Margot/AP Photo

By **ZACH MONTELLARO** and **KYLE CHENEY**
12/03/2020 04:30 AM EST



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Attorney Sidney Powell's mythology has gained traction with a slice of the MAGA orbit. | Ben Margot/AP Photo

By ZACH MONTELLARO and KYLE CHENEY
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Sidney Powell released the Kraken. And it turns out the mythological sea beast can't spell, is terrible at geography and keeps mislabeling plaintiffs in court.

A congressional candidate Powell claimed to represent in one lawsuit said that, in fact, he had nothing to do with Powell or her quixotic effort, which she dubbed "the Kraken," arguing the election was stolen from President Donald Trump. An expert witness cited in another suit named a nonexistent county in Michigan. A Wisconsin lawsuit sought data on alleged irregularities at a voting center in Detroit, which is in Michigan. And a filing in federal district court signed by Powell misspelled "district" twice in the first few lines.

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96-year-old puts house for sale and once people see inside they are stunned.

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Today's Rate **1.99% APR**

Loan amount:
Loan term:
Credit score:

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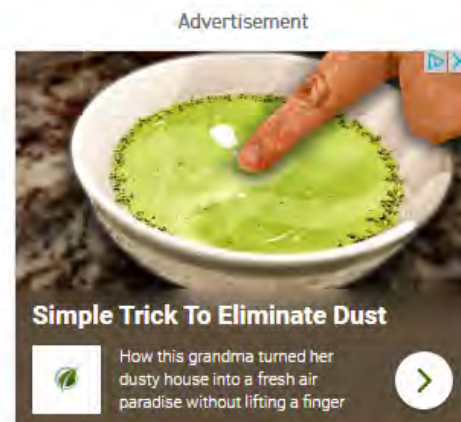
The sloppy mistakes aren't just a sideshow, [despite Powell's quip on Twitter](#) when a POLITICO reporter took note of the mangled words: "No extra charge for typos." Judges also have been flummoxed by the procedural moves and errors committed by Powell, who was booted from Trump's legal team in November but still is crusading to overturn the election results.

"While the caption of the motion includes the word 'emergency' and the attached proposed order seeks an 'expedited' injunction, neither the motion nor the proposed order indicate whether the plaintiffs are asking the court to act more quickly or why," Pamela Pepper, chief judge of the U.S. District Court for the Eastern District of Wisconsin, wrote in an order [issued on Wednesday](#). "As indicated, the motion does not request a hearing. It does not propose a briefing schedule."


Giuliani and fellow Trump lawyers crank out c...

< Share

As indicated, the motion does not request a hearing. It does not propose a briefing schedule.”



Yet despite the deficiencies of her legal efforts, Powell’s mythology has gained traction with a slice of the MAGA orbit, from well-known Trump allies like former national security adviser Michael Flynn, a Powell client who last week won a presidential pardon, to hundreds of attendees at a Wednesday rally Powell and fellow Trump-supporting lawyer Lin Wood held in Georgia. They solicited donations and urged Republicans to withhold their votes from the GOP senators engaged in January runoffs in the state, saying they have been insufficiently supportive of Trump, whom both senators back.

Refinance Calculator 

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Loan amount	\$400,000
Loan term	15-Year Fixed ▼
Credit score	Excellent ▼

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The call set off a wave of concern among Republicans trying to defend their Senate majority. But Trump himself is giving oxygen to some of Powell’s theories, alluding to them during a 45-minute speech he posted online later on Wednesday. Trump claimed votes were switched by voting machines — a debunked conspiracy theory that’s at the center of Powell’s case.

Senate majority. But Trump himself is giving oxygen to some of Powell's theories, alluding to them during a 45-minute speech he posted online later on Wednesday. Trump claimed votes were switched by voting machines — a debunked conspiracy theory that's at the center of Powell's case.

Powell and Wood allege a vast conspiracy in which states' electronic voting systems have been manipulated by a company with ties to the late Venezuelan president Hugo Chávez. What has set them apart from Trump's official legal team, which has offered similarly unsupported claims of fraud, is their willingness to accuse sitting Republican officials of committing crimes to aid Biden's election.

"We will give all our evidence to the Department of Justice as soon as we get it pulled together," Powell said at the rally. "I wish I could say I didn't have concerns about how that would be handled, but unfortunately I still do."

Federal and state officials have described the allegations as absurd and lacking any concrete evidence. Georgia election officials [pleaded with Republicans](#) across the country to call out the baseless claims. On Tuesday, Attorney General William Barr became the latest to reject the idea that evidence of widespread fraud has been discovered.

"There's been one assertion that would be systemic fraud and that would be the claim that machines were programmed essentially to skew the election results," Barr said in an [interview with The Associated Press](#) earlier in the week. "And the DHS and DOJ have looked into that, and so far, we haven't seen anything to substantiate that."



Powell acknowledged the errors in an email but dismissed them as "typos" and

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Powell acknowledged the errors in an email but dismissed them as "typos" and said they're the result of round-the-clock work and will be corrected "as needed."

"Humans make mistakes. We're human beings. We will correct them as needed and appropriate," she said. "Wish we had you working 22 hours a day like our little team is to help proofread and get it all right."

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"It does not change the substance of the claims or the evidence," she continued. "Perhaps you all should consider focusing on the evidence and facts instead of typos."

But the evidence Powell cites, mainly from affidavits filed by election volunteers, observers and outside analysts, has similarly failed to show the fraud she claims should not only overturn the election but give it to Trump in a landslide.

At least twice, Powell has sued on behalf of a party that did not agree to be a part of the case. In a filing in Wisconsin, Powell included Derrick Van Orden, a Republican candidate who narrowly lost to Rep. Ron Kind (D-Wis.), as a plaintiff. But Van Orden said he had nothing to do with the suit in a statement on Twitter.

"I learned through social media today that my name was included in a lawsuit without my permission," he [tweeted on Tuesday](#). "To be clear, I am not involved in the lawsuit seeking to overturn the election in Wisconsin." Van Orden, who could not be reached by POLITICO, [told the AP](#) that he had spoken with someone in Powell's office about the case but had not given permission to

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without my permission,” he [tweeted on Tuesday](#). “To be clear, I am not involved in the lawsuit seeking to overturn the election in Wisconsin.” Van Orden, who could not be reached by POLITICO, [told the AP](#) that he had spoken with someone in Powell’s office about the case but had not given permission to be added to it, and he tried calling her to ask to have his name removed but couldn’t get through.

POLITICO DISPATCH: DECEMBER 3

It’s a split-screen response: Trump is virtually silent on the pandemic, while Biden is preparing to take office during the outbreak’s darkest period. POLITICO’s Dan Diamond breaks down how the teams are coordinating — and not — as the transition approaches.

98:00 12:45

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It was the second time Powell had done this. In a suit in Georgia, she listed Cobb County Republican Party Chair Jason Shepherd as a plaintiff, acting on behalf of the local party. Shepherd initially put out a statement saying [she had done so preemptively](#) and without his final sign-off, though Shepherd and the county party then agreed to stay on the suit.

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Meanwhile, in [a suit in Michigan](#), Powell included a “[declaration](#)” [sic] from a so-called cybersecurity expert, Navid Keshavarz-Nia, that hits on a popular conspiracy theory — Hammer and Scorecard — alleging that vote totals were hacked.

Chris Krebs, the former director of the Cybersecurity and Infrastructure Security Agency whom Trump fired for declaring the election secure, called this [particular conspiracy theory](#) “nonsense.” But in his declaration, Keshavarz-Nia alleges a pattern of improbable vote reporting in “Edison County, MI” that backs up his theory.

The only problem: No county by that name exists in Michigan.

In [the Wisconsin lawsuit](#) that incorrectly included Van Orden as a plaintiff, the

The only problem: No county by that name exists in Michigan.

In [the Wisconsin lawsuit](#) that incorrectly included Van Orden as a plaintiff, the suit asks for a judge to order the “immediate production of 48 hours of security camera recording of all rooms used in the voting process at the TCF Center.” But the TCF Center is not in Wisconsin. It is in Detroit, and was the center of other election-related conspiracy theories.

Another [brief from Powell](#) in the Wisconsin case misattributes Biden’s margin of victory in the state to Georgia, writing “Biden has been declared the winner of Georgia’s General Election for President by a difference of 20,585 votes.” The brief also mixes up the two states at one point.

Weekly Score

Your guide to the year-round campaign cycle.

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“Defendants failed to administer the November 3, 2020 election in compliance with the manner prescribed by the Georgia legislature,” reads the memorandum targeting Wisconsin election officials who are defendants in the case. “This conduct violated Plaintiffs’ equal protection and due process rights as well their rights under Wisconsin law.”

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A lawsuit filed by Wood, a Powell collaborator, made a similar mistake. A suit he filed in Georgia [included an affidavit](#) from Russell James Ramsland Jr., who represented himself as a security expert. But, while alleging some type of fraud in Michigan, he instead included towns that are from Minnesota, which was first noticed [by the conservative Powerline Blog](#). In the Michigan case from Powell, she calls Ramsland an “expert witness,” with [a new affidavit](#) that does include towns that are actually in Michigan.

Powell has also misrepresented government documents. [The Georgia lawsuit](#)

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Powell, she calls Ramsland an “expert witness,” with a new affidavit that does include towns that are actually in Michigan.

Powell has also misrepresented government documents. The Georgia lawsuit alleges that “a certificate from the Secretary of State was awarded to Dominion Voting Systems but is undated,” attaching a copy of the certificate.

The reality is more prosaic. As Reuters first reported, the actual certificate from the secretary’s office is both dated and publicly available online.



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Exhibit 62



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2020

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2018

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Twitter Trends on Trending words on 7th November, 2020

Twitter's top trending topics on Trending words on 7th November, 2020.

1. [Quebec](#)
2. [Lincoln Project](#)
3. [Mark Meadows](#)
4. [#BidenHarris2020](#)
5. [hobi](#)
6. [#Election2020results](#)
7. [Zach Wilson](#)
8. [YOU'RE FIRED](#)
9. [#SaturdayMorning](#)
10. [RATM](#)
11. [Kamala](#)
12. [Dominion](#)
13. [BY A LOT](#)
14. [Rahm](#)
15. [Chris Cuomo](#)
16. [Nestor](#)

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14. [Rahm](#)
15. [Chris Cuomo](#)
16. [Nestor](#)
17. [Boise](#)
18. [Listening to Biden](#)
19. [#WhyDontWeKIMMEL](#)
20. [Madam Vice President](#)
21. [Four Seasons Total Landscaping](#)
22. [Van Jones](#)
23. [#PresidentElectJoe](#)
24. [First Lady](#)
25. [#bidenharis2020](#)
26. [Jim Jordan](#)
27. [#AEWFullGear](#)
28. [#CallTheElection](#)
29. [Newfoundland and Labrador](#)
30. [Betsy DeVos](#)
31. [Donald Trump](#)
32. [YOU LOST](#)
33. [Dream Team Twitter](#)
34. [Four Seasons](#)
35. [Leslie Jones](#)
36. [Rage Against the Machine](#)
37. [#EVE MUN](#)
38. [#njpst](#)
39. [#UFCVegas13](#)
40. [White House](#)
41. [Yukon Territory](#)
42. [On Eagle's Wings](#)
43. [Trask](#)
44. [Harbaugh](#)



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- 42. [On Eagle's Wings](#)
- 43. [Trask](#)
- 44. [Harbaugh](#)
- 45. [#ByeDon](#)
- 46. [NC State](#)
- 47. [D'Eriq King](#)
- 48. [Brooklyn](#)
- 49. [Penn State](#)
- 50. [Gators](#)

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Next Day ▶

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5/1 ARM
3.03%
APR | \$300,000

15-YR FIXED
2.13%
APR | \$300,000

30-YR FIXED
2.27%
APR | \$300,000

Google Trends on Trending words on 7th November, 2020

Google's top search words on Trending words on 7th November, 2020.

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2. [Johnny Depp](#)
3. [Starbucks](#)
4. [Everton vs Man United](#)
5. [iPhone 12 Pro Max](#)
6. [Al Roker](#)



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4. [Everton vs Manchester](#)
5. [iPhone 12 Pro Max](#)
6. [Al Roker](#)
7. [Anderson Cooper](#)
8. [Gleb Savchenko](#)
9. [Biden speech tonight](#)
10. [Mark Meadows](#)
11. [Lindsey Graham](#)
12. [Kamala Harris](#)
13. [Van Jones](#)
14. [Decision Desk HQ](#)
15. [BYU football](#)
16. [Stephen Colbert](#)
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APR | \$300,000

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APR | \$300,000

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November 2020						
Sun	Mon	Tue	Wed	Thu	Fri	Sat
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30					

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APR | \$300,000

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2.27%

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Nov 2020



Sun	Mon	Tue	Wed	Thu	Fri	Sat
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30					

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3.03%

15-YR FIXED

2.13%

30-YR FIXED

2.27%

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5/1 ARM

3.03%

APR | \$300,000

15-YR FIXED

2.13%

APR | \$300,000

30-YR FIXED

2.27%

APR | \$300,000

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Attorney Sidney Powell drops more bombshells, says election software that rigged 2020 elections has been used for years to steal House, Senate, governor races

By JD Heyes - December 9, 2020

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(Natural News) Sidney Powell, who left the Trump campaign legal team to pursue other avenues of massive electoral fraud she uncovered shortly after the November elections, continues to reveal stunning information garnered from her continued investigative work proving beyond any doubt that Americans have lost control over the only real power we had

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(Natural News) Sidney Powell, who left the Trump campaign legal team to pursue other avenues of massive electoral fraud she uncovered shortly after the November elections, continues to reveal stunning information garnered from her continued investigative work proving beyond any doubt that Americans have lost control over the only real power we had left as individuals: The power of choice at the ballot box.

In previous weeks, Powell revealed that software used by voting machine companies in the U.S. and abroad was developed and financed by some of our enemies, including Venezuela, Iran and China.

But in an interview with TBN's Mike Huckabee on Saturday, Powell suggested that the software was actually a CIA-developed election theft tool that may have been exported to other countries and then, ultimately, deployed against American elections.



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"The system right now is corrupt. The Dominion machines cannot be relied on at all. And we want everyone — Republicans, the candidates, everyone — to stand up and speak up about the fraud that happened in Georgia and find a way to vote in time that allows people to know that their vote is being counted the way they voted it," she began, clearing up a previously reported claim that she didn't want Republican voters to show up to cast ballots for the state's two GOP senators in run-off elections next month.

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"Because right now, the system is just as rigged as it was four weeks ago," she added. "We can't trust it. And there has to be a way to get it right so that everyone who votes — and we encourage everyone to vote — knows their vote is real and being counted, and not...otherwise rigged."

"You can't repeat the same procedure and expect a different result."

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"It's extremely unsettling to know that American elections have been just as rigged as elections in third-world countries have been," she said later, in reference to the massive theft that occurred for Joe Biden in several swing states last month.



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Favorable

Unfavorable

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"I'm sure the CIA has been involved in any number of those activities, if not here then in other places around the world," she continued. "It may have been the CIA that created this software and programs to begin with and then exported it for their own use, only to have it come back to us.

"It could be that very important, powerful, extremely wealthy people were involved in rigging this election. It's globalist interests. I mean, frankly, everyone in the world except the



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Source: DC Dirty Laundry | Published: December 28, 2020 - 11:44 am

"It could be that very important, powerful, extremely wealthy people were involved in rigging this election. It's globalist interests. I mean, frankly, everyone in the world except the millions of Americans that wanted to elect Donald Trump to clean up the swamp and drain the swamp," she said. (Related: [Georgia Gov. Kemp calls for legitimate signature audit of mail-in ballots after damning CCTV video exposes massive election fraud.](#))

Voters who chose to reelect our real president didn't want "this world to continue the way it was, with them having all the power and working behind the scenes to rig elections and everything else so that they could profit from their own nefarious activities," Powell went on.

"I mean it's massive. I'm sure the media companies are involved in it, too," she said, noting that on election night it appeared that a coordinated effort was underway to stop reporting on returns and for swing states to stop counting ballots at nearly the same time.



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"This isn't the first time it's happened, Mike. We don't even know how many elections have been rigged by virtue of the software," she noted further, setting viewers up for another massive bombshell.

"There's no telling how many congressional and Senate seats and even governorships we've lost...because of this" fraud. "They've been telling us the country has been trending blue. It has not. That is an abject lie. And we've collected the data that's gonna show that, among many other things," she said.

Stay current on Trump's ongoing efforts to root out election fraud corruption at [Trump.news](#).

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Source: DC Dirty Laundry | Published: December 28, 2020 - 11:44 am

Trump authorizes special prosecutor John Durham to use classified info in ongoing "Russiagate" probe



Source: DC Dirty Laundry | Published: December 28, 2020 - 9:33 am

Nashville explosion was actually a missile strike, and the target was the AT&T / NSA hardened switching facility "spy hub"



Source: DC Dirty Laundry | Published: December 27, 2020 - 11:50 pm

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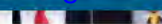
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December 29, 2020



Exhibit 64



daniel lynn
@daniellynn0001

They have been stealing elections for years, using Dominion.

I think we knew that already.

Attorney Sidney Powell drops more bombshells, says election software that rigged 2020 elections has been used for years to steal House, Senate, governor races



Attorney Sidney Powell drops more bombshells, says elec...
(Natural News) Sidney Powell, who left the Trump campaign legal team to pursue other avenues of massive ...
dccllothesline.com

12:25 PM · Dec 9, 2020 · Twitter Web App



Exhibit 65



sofia sjöberg
@risalusofia

Replying to @risalusofia

We start with the election and Sidney Powell. She stated that this election is the most corrupt election ever. And she made a lot of people aware of Dominion - Dominion comes from Venezuela and Venezuela is like a Swedish colony. What Sweden or rather what someone controls...

10:46 PM · Dec 8, 2020 · Twitter Web App

8 Retweets 55 Likes



Exhibit 66



Stephen
@Stephenwc24

Replying to @realDonaldTrump

There has been so much fraud, Republican ballots destroyed, fake ballots printed by China and the Dems, Dominion machines moving Trump votes to Biden - that there is no way we can recoup. The only possibility at this point is to call for a new national election - w/o fraud!

12:58 PM · Dec 9, 2020 · Twitter Web App



Exhibit 67



Bruce Robinson

@brsquared

...

Replying to @BreakerCoup @war_on_morons and @marklevinshow

"no evidence of fraud that would change the results of the election" - You left out the word "yet". Several years ago Democrats thought Dominion was bad but now they are in bed with them. Dominion et al was created in Venezuela for Chavez & Maduro.

12:32 PM · Dec 9, 2020 · Twitter for Mac



Exhibit 68



Exhibit 69



Donna G
@DonnaG7216

Replying to @CodeMonkeyZ

Did no one hear when Sidney Powell said there was evidence that many state governors, INCLUDING KEMP, were paid off by Dominion to allow their machines to be installed before the 2020 elections? This was when she said she was going to 'release the kraken.'

8:08 PM · Dec 8, 2020 · Twitter for iPhone



Exhibit 70



Heathers
@NCPatriotMom

Replying to @baynoni @kleptoast and 5 others

Sidney Powell is saying Republicans do this too. She says we will hear evidence once in court that politicians can pay Dominion to win. One Republican she outted and restated today is Kelly Loeffler. She said she has evidence GovKemp ensured it.

7:57 PM · Dec 8, 2020 · Twitter for iPhone



Exhibit 71

A Democratic Stress Test — The 2020 Election and Its Aftermath

Bright Line Watch November 2020 surveys

The 2020 election and its aftermath presented severe challenges to U.S. democracy. The election was conducted during a pandemic that required [fundamental changes](#) in how Americans cast and counted ballots. The incumbent president [refused to commit](#) in advance to a peaceful transition of power if he lost, and continues to [refuse to recognize](#) that defeat as legitimate (though he has finally [relented](#) to letting the transition begin and [signaled](#) that he would accept an Electoral College defeat). During this process, many GOP [leaders](#) have [endorsed](#) the president's baseless claims of electoral fraud, even [publicly suggesting](#) that state legislatures could override the popular vote in awarding electors. Yet the election ultimately succeeded in ways few dared hope. Most notably, polling places and mail balloting [operated effectively](#) and [mostly uneventfully](#) under unprecedented conditions. And despite a barrage of accusations and litigation, [no evidence](#) has surfaced of systematic malfeasance or mismanagement.

To assess the importance and consequences of these events, [Bright Line Watch](#) fielded parallel surveys of political science experts and of a representative sample of Americans to assess the importance and magnitudes of these events. In this post-election survey, which was fielded from November 12–25, we asked our public sample questions about the legitimacy of the election results, their confidence that votes were cast and counted fairly, their beliefs about voter fraud, and their willingness to condone political violence. We asked our experts to rate the likelihood of 23 scenarios related to the November election and the transition to a new administration that could produce political crises, and to evaluate a number of recent events related to the election. As in previous surveys, we asked both groups to assess the quality of U.S. democracy overall and to rate performance on 30 distinct democratic principles.

We report a number of key findings below from both the public and the experts we surveyed:

Public

- Compared to before the election, confidence in the election process and the legitimacy of the outcome became much more polarized between supporters and opponents of President Trump.
- Most notably, confidence in the national vote count plummeted among Trump supporters, declining from 56% before the election to 28% afterward.
- Similarly, belief polarization about voter fraud grew still wider — in particular, even larger majorities of Trump supporters now believe that fraud is rampant compared to before the election.
- More encouragingly, willingness to condone political violence declined slightly after the election.

Experts

- Expert forecasts in October correctly identified the six nightmare scenarios that did actually transpire as among the eight that they forecast as most likely, but generally overestimated the probability of outcomes seen as somewhat or not very likely (none of which actually took place).
- Experts believe it is highly likely that President Trump will continue to refuse to recognize Biden's presidency and to obstruct the transition, and that the President will take actions to protect himself and those around him from legal exposure after leaving office. They regard problems with the Electoral College and the formal recognition of Biden's presidency as unlikely.
- Large majorities of experts regard Trump's attacks on U.S. elections and the press as serious or grave threats to American democracy. By contrast, experts do not consider mail balloting to pose a threat to democracy and are divided over Amy Coney Barrett's Supreme Court appointment.

We present our results in three parts. First, we review the public's perception of various aspects of the November election. We then describe experts' assessments of the election and events in its immediate wake. Finally, we step back to gauge how both the public and the experts rate the performance of American democracy both overall and across thirty core democratic principles.

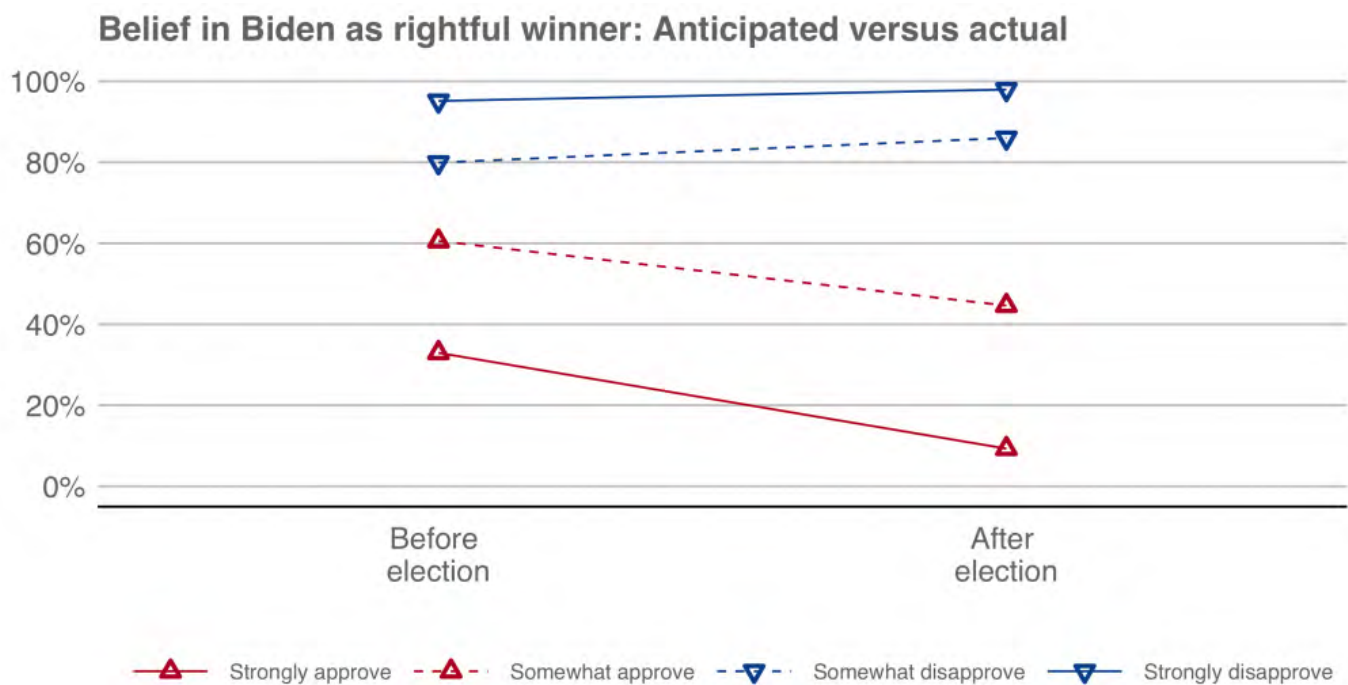
The public's view of the election

The November survey asked questions about a number of topics we previously asked about in October, including confidence in the election, beliefs about voter fraud, and attitudes toward political violence (the wording on some items was adjusted to be retrospective rather than prospective when necessary). We report here on the public's views after the election and how they compare either for the full October and November samples or, in some cases, for the subset of respondents who took part in both surveys.

Legitimacy

We asked respondents in our public survey, which was conducted after the media [called the race](#) for Biden, if they regarded Joe Biden as the rightful winner of the presidential election. During the time that the survey was in the field, President Trump continued to [press the case](#), without evidence, that elections in key states were marred by fraud, though he [allowed the transition](#) to begin just before the survey was completed and acknowledged the [possibility of stepping aside](#) if he loses the Electoral College vote soon after the survey was completed. We divide our respondents between those who approve and those who disapprove of Trump's performance as president. Among those who disapprove, 86% regard Biden as definitely the rightful winner and another 9% regard him as probably the rightful winner. Among those who approve of Trump, the corresponding figures are just 8% and 17%, respectively. Similarly, just 18% of those who approve of Trump say the true result of the election was that Biden won; 30% said Trump won and 52% said the winner was not yet known or they didn't know.

Partisan polarization over the legitimacy of the outcome was more severe than it appeared it would be in the October survey. In that earlier survey, we asked respondents to imagine a win by each major candidate. In October, 33% of survey respondents who strongly approved of Trump said they would view a victorious Biden as definitely or probably the “rightful winner.” After the election, only 9% of these same respondents said Biden was actually the rightful winner. Indeed, fully 67% of strong Trump supporters expressed certainty that Biden is definitely *not* the rightful winner.



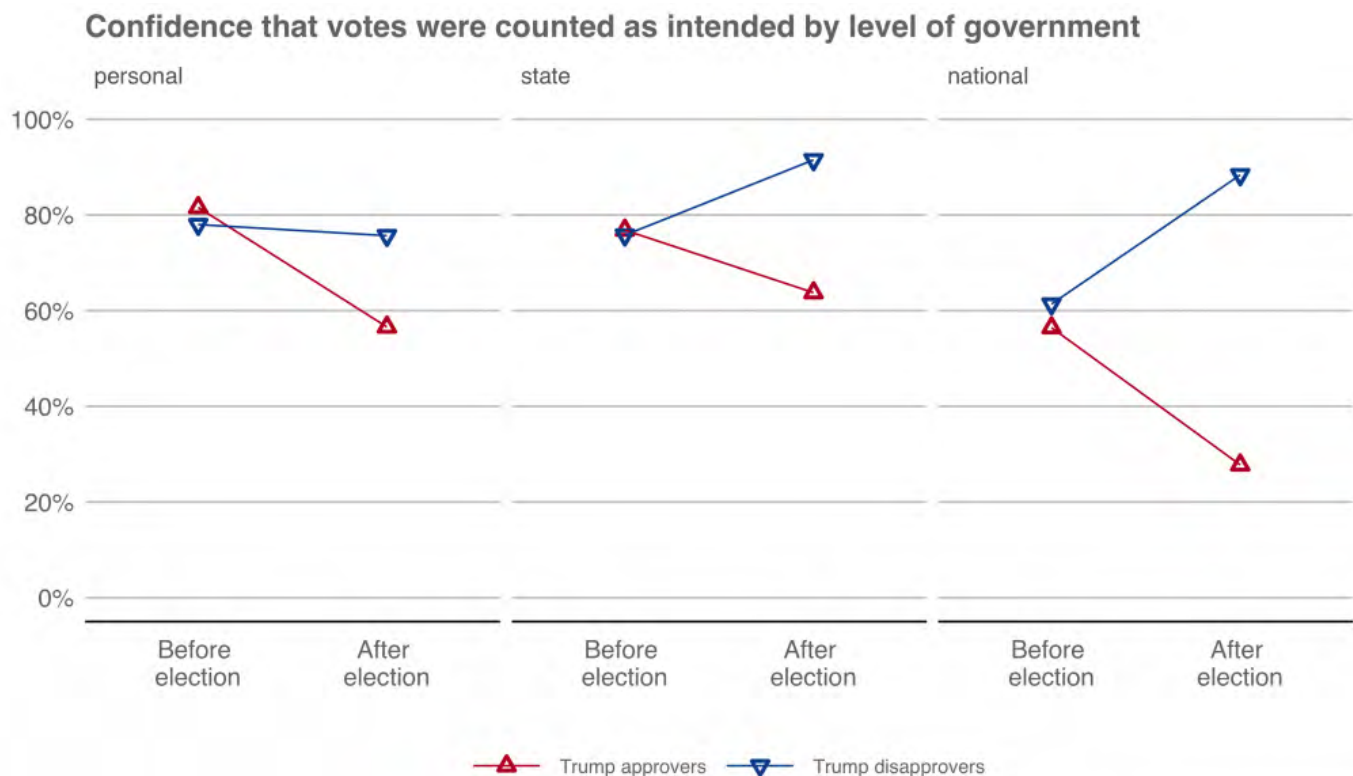
Source: @BrightLineWatch

Differences in the perceptions of pro- and anti-Trump respondents are not the result of the two groups having different basic information about the election outcome. We asked each respondent to indicate whether they had heard that the media had declared a winner. Between 80% and 88% of each group had heard this news. We asked which candidate had been declared the winner. More than 8 in 10 Trump supporters acknowledged it was Biden (84%), not far behind the 95% of Trump opponents who knew this fact. Yet when we asked each group whom they believed would be inaugurated on January 20, 2021, nearly the same number of Trump supporters said they expected to see Trump sworn in for a second term (48%) than expected to see Biden take the oath (49%). Among Trump opponents, 96% expected Biden to be inaugurated.

Confidence in the ballot and the count

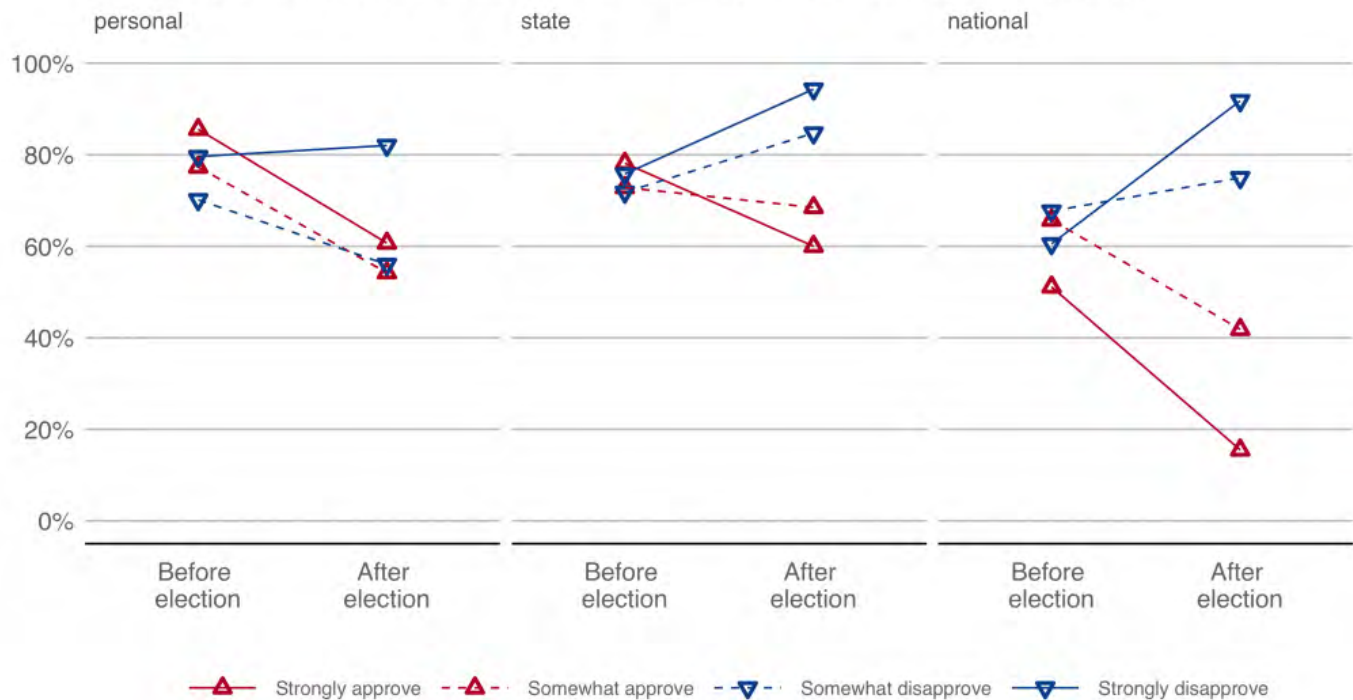
Our survey also probed what substantive beliefs underpin the suspicions among Trump supporters. We first asked public participants how confident they are that everyone who was legally entitled to vote and sought to do so was able to vote successfully. These differences are limited. Seventy-four percent of Trump supporters and 84% of Trump opponents said they were either very or somewhat confident that the franchise was open to all eligible voters (as opposed to not very or not at all confident). This gap narrowed since October; confidence in ballot access among Trump opponents increased from 65% to 84% (potentially reflecting [record turnout](#) and/or the election outcome), while falling among Trump supporters (from 85% to 74%).

Trump supporters and opponents differ most in their expressed levels of confidence in how votes were counted. We asked each respondent about confidence that their own vote was counted as intended, that votes in their state were counted as voters intended, and that votes nationwide were counted as voters intended. The figure below shows the levels of “very” and “somewhat confident” responses (as opposed to not very and not at all confident) among Trump approvers (red) and disapprovers (blue) in our pre-election and post-election surveys. Among Trump opponents, the proportion who expressed confidence that their vote was counted as intended is unchanged from October to November, but confidence at the state and national levels rose sharply (from 76% to 92% and from 61% to 88%, respectively). By contrast, confidence plummeted at all levels among Trump supporters over the same period. Confidence declined from 82% to 57% for the respondent’s own vote and from 77% to 64% in voting at the state level. Most notably, however, confidence in the national vote count collapsed from 56% to 28% among Trump supporters at the national level.



The figure below disaggregates respondents who took part in both surveys by their level of Trump approval or disapproval in October. The decline in confidence in the national vote was greatest among Trump's most devoted supporters, who appear most receptive to messages from Trump and Republican elites questioning the integrity of the election outcome. Specifically, confidence in the national vote declined from 51% to 15% among people who strongly approved of Trump's performance in office in October (versus 66% to 42% among those who somewhat approve). Among those who disapprove of Trump, confidence at state and national levels rose over the same period.

Confidence that votes were counted as intended by level of government



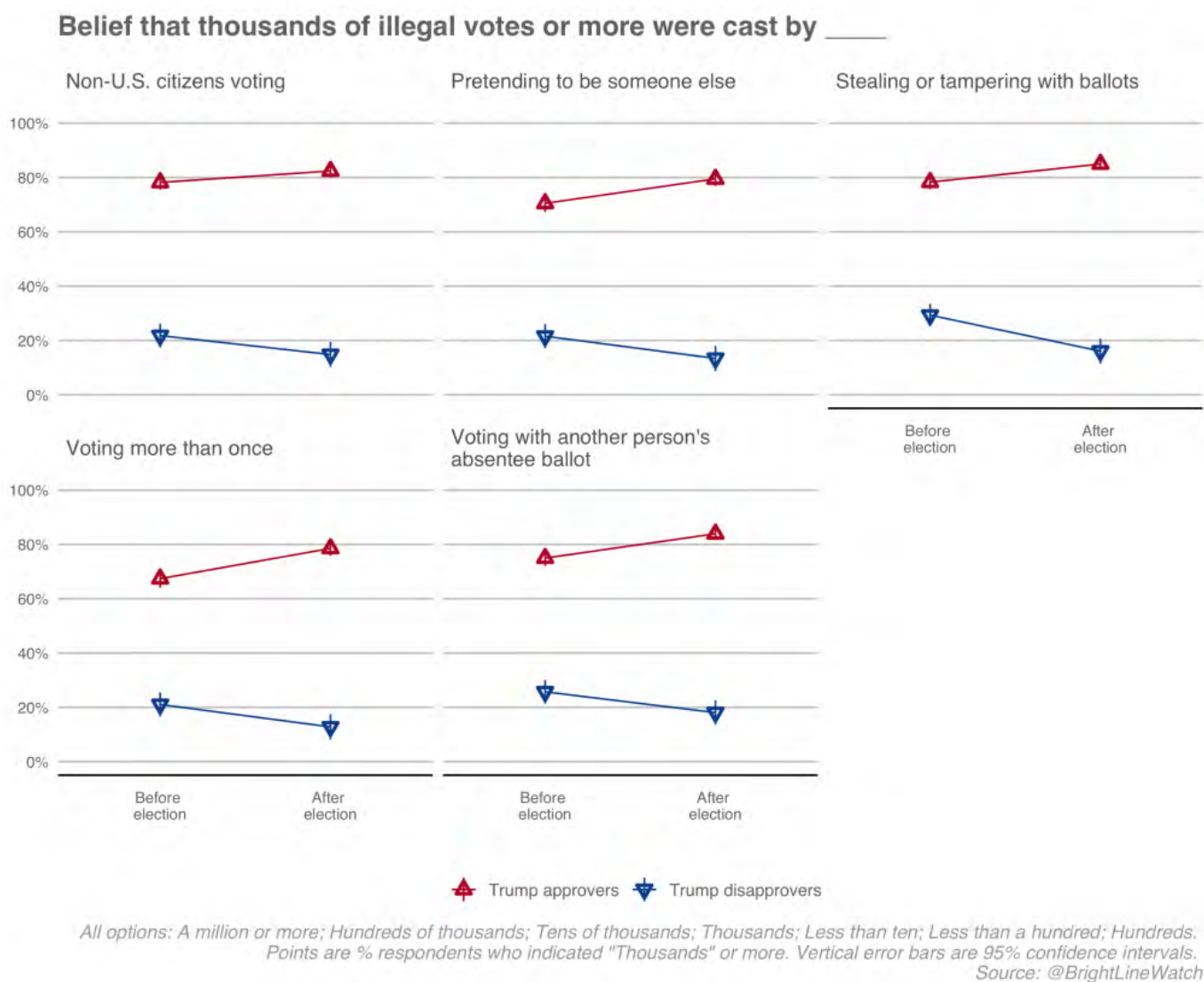
Source: @BrightLineWatch

Incidence of voter fraud

If three-quarters of the president's supporters do not believe national vote tallies, what do they regard as the source of mischief? President Trump has made baseless allegations throughout his presidency that American elections are marred by widespread fraud. Although voter fraud is vanishingly rare [in general](#) and [no evidence](#) has been presented of systematic fraud during the 2020 contest, false claims from the President and his allies appear to be affecting the beliefs of Trump supporters.

We asked respondents about the prevalence of five different forms of fraud: voting by non-citizens, voting under a false identity, stealing or tampering with ballots, voting more than once, and voting with another person's absentee ballot. Respondents were asked, for each type of fraud, how many instances they believe occurred in the November election on a seven-point scale from "Less than ten" to "A million or more." The figure below shows the percentage, among each group, that believes the incidence was "Thousands" or higher for each type of fraud.

Even among Trump opponents, perceived fraud was vastly more common than any documented evidence supports. Levels among Trump supporters are multiple times higher still — they were, for instance, more likely to select “Millions” than “Thousands” as a response option. Moreover, the gap in perceived fraud levels between Trump supporters and opponents only increased from October to November. Trump opponents perceived each type of fraud to be less frequent, while Trump supporters became more convinced of unbridled misconduct. (See Figure 11 in the appendix for partial distributions of responses for each item and group.)



The figure makes clear that overwhelming majorities of Trump supporters — between 79% and 85% — regard every form of malfeasance we asked about as having occurred thousands of times or more (up to millions) in the 2020 election. The levels of fraud in which these respondents profess to believe are staggering and would require the com-

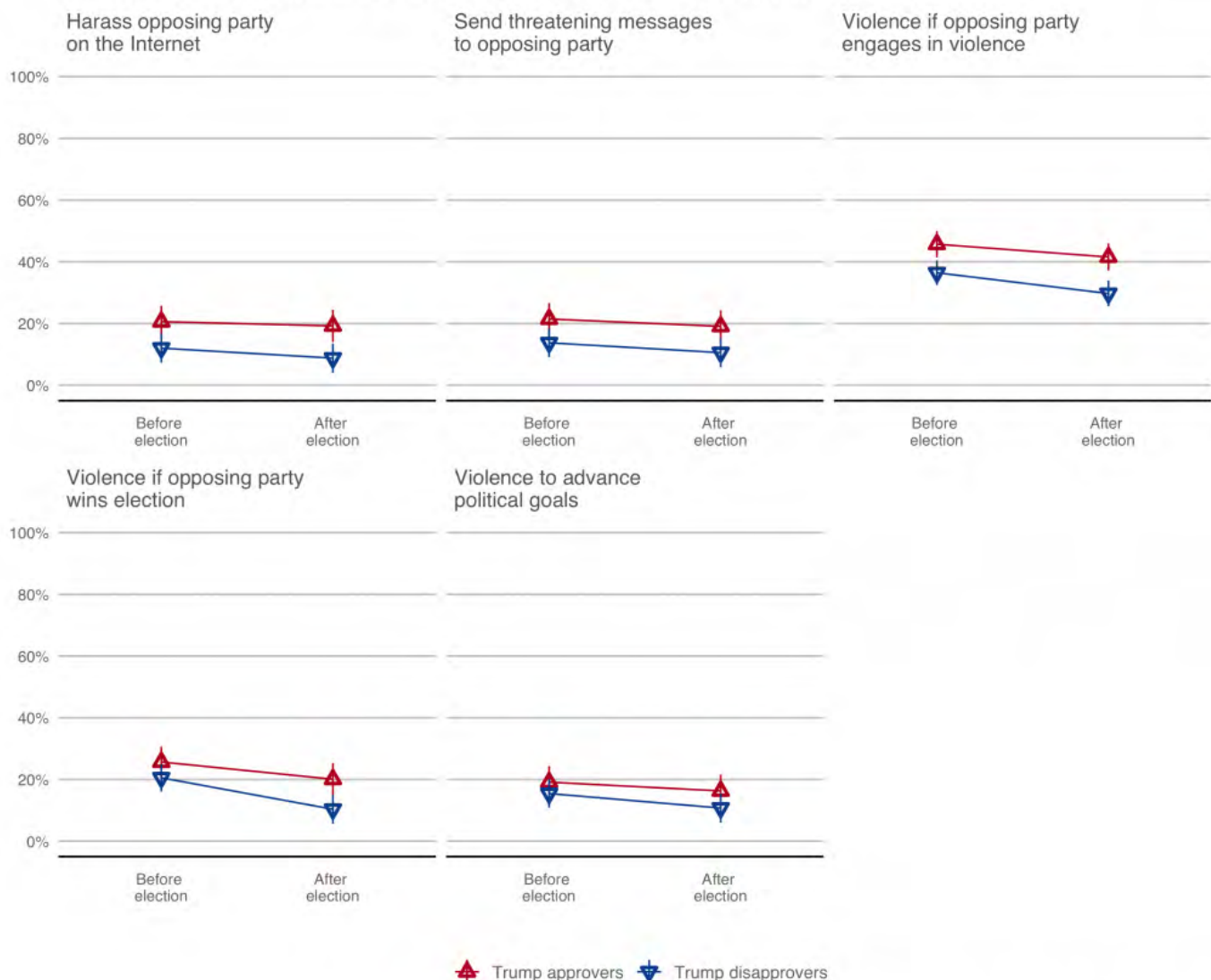
plicity of thousands of local electoral officials and volunteers, including numerous Republicans and non-partisan participants. However, though claims of widespread fraud and electoral misconduct have been repeatedly [dismissed](#) by judges in [Pennsylvania](#), [Michigan](#), [Nevada](#), [Arizona](#), and [Georgia](#), they have become pervasive among Trump supporters.

Tolerance for violence

Finally, we consider the public's willingness to condone political violence and intimidation, a topic of widespread [concern](#) prior to the election, particularly after law enforcement foiled a [plot](#) by self-styled militia members to kidnap Michigan Governor Gretchen Whitmer in October. Thankfully, the November election itself went off without a major incident of violence. With the exception of confrontations at a Washington, DC rally between Trump supporters and his opponents that left one person [hospitalized](#), celebrations and demonstrations following the declaration of Joe Biden as the winner were also largely peaceful. Following [research](#) by Nathan Kalmoe and Liliana Mason, we asked our respondents about whether it is ever justified to harass partisan opponents online, send a threatening message to an opposing party leader, use violence to advance one's goals, use violence in response to violence from the other party after the election, or use violence if the other party wins the next election.

Here, we find a bit of good news — willingness to condone intimidation and violence declined from October to November. The magnitudes of these declines were modest but they were statistically discernible from zero for every item in the survey battery among President Trump's opponents and for 2 of 5 items ("Violence if the opposing party wins an election" and "Violence to advance political goals") among Trump supporters. The figure below shows slight decreases in the percentage of respondents who say that they would occasionally, frequently, or always resort to violence in each scenario (the residual category was "never"). The experience of a relatively peaceful election appears to have reduced perceptions of threat from partisan adversaries.

Willingness to condone political violence and harassment



All options: Never; Occasionally; Frequently; Always. Points are % respondents who did not select "Never". Vertical error bars are 95% confidence intervals. Source: @BrightLineWatch

Experts' views

We asked our expert sample to evaluate the likelihood of a number of prospective scenarios frequently discussed in the media, and to assess events that have already happened according to their normality, their importance, and the potential threats they present to American democracy.

Nightmares that happened, that did not, and that could loom ahead

Both the October and November surveys asked our experts to estimate the probability of election-related scenarios that could create crises for democratic institutions. We

asked them about 28 distinct scenarios. In October, there were eight nightmare scenarios on which the median expert forecast was 70% or higher (i.e., experts thought there was at least a 7 in 10 chance the event would occur):

- Millions of Americans are exposed to false claims about voter fraud and election integrity on social media from unknown or obscure sources on Election Day (95%).
- President Trump attacks the “blue shift” toward Democrats as mail votes are counted, insisting that the initial totals on Election Night were correct (85%).
- Tens of thousands of voters are still in line when polls are scheduled to close in at least one state due to long lines and delays on Election Day (84%).
- President Trump makes statements or posts tweets encouraging violence and intimidation during voting or ballot counting (81%).
- President Trump is declared the loser of the election by the Associated Press but refuses to immediately concede defeat (80%).
- One or both presidential candidates declare victory before the race has been called by the Associated Press (70%).
- Interim Election Night totals understate Democratic votes, creating widespread suspicion of the results (70%).
- 5% or more of ballots cast by mail are rejected in one or more states (70%).

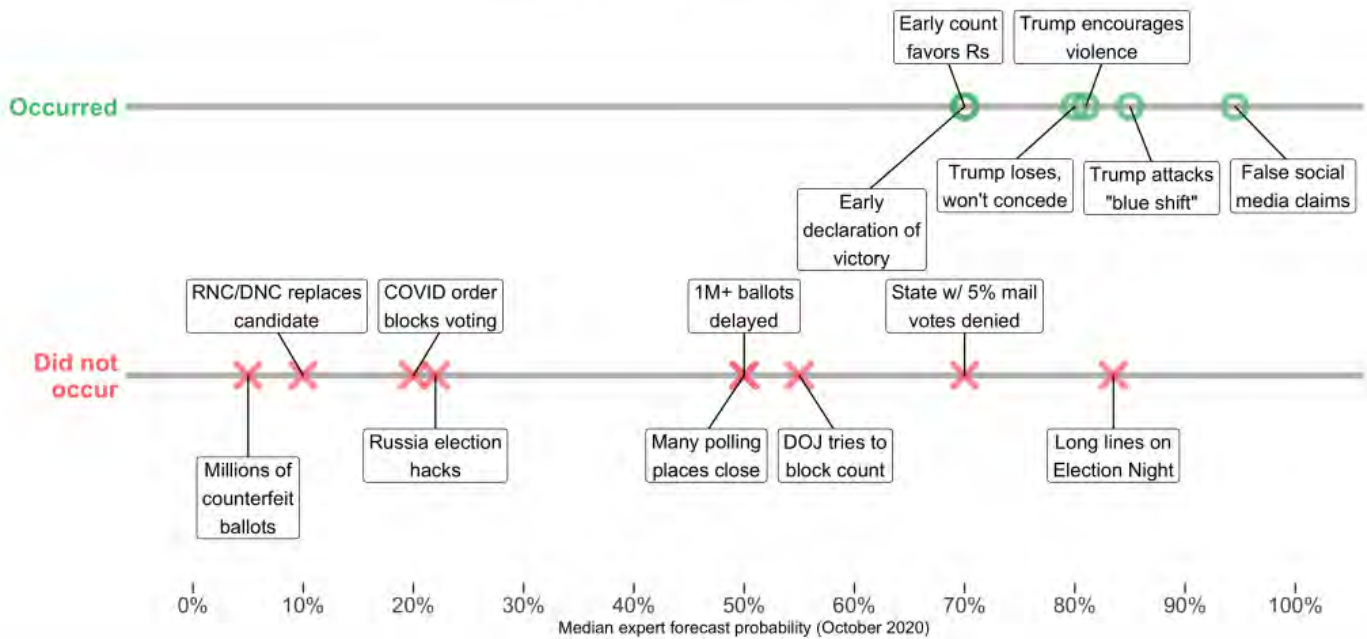
Of those projections, the two predicting election administration failures were clearly incorrect. Polling places operated with remarkable effectiveness; expectations about long lines and delays for voters did not materialize. Similarly, rates of mail-in ballot rejection were **lower** than in previous elections, generally **at or below** one percent and never exceeding the five percent threshold in any state that many experts feared. The other six high-likelihood nightmare scenarios did, in fact, materialize. President Trump **encouraged** his supporters to engage in **tactics** that could intimidate other vot-

ers and vote counters, then **declared victory** on Election Night. Election Night vote totals **understated** Democratic support, Trump **insisted** vote counting should stop, Trump was declared the loser but **refused** (and still refuses) to concede, and **false claims** about voter fraud and election integrity have flooded social media on and after Election Day.

None of the other twenty scenarios have taken place to this point. These were scenarios which, on average, experts rated as having a probability of taking place that was as low as five percent or as high as 64%. (Our prior report **indicated** that these probabilities seemed too high; see its appendix for the full list.) Of these, seven did not take place as specified, including scenarios experts rated as quite possible, such as the Department of Justice seeking to block the counting of mail-in ballots (55%), postal service delays causing more than one million mail ballots sent by voters to not be delivered in time to be counted (50%), or poll-worker shortages forcing the Election Day closure or consolidation of more than one thousand polling locations nationwide (50%). Experts were appropriately skeptical of other scenarios that did not take place, including millions of counterfeit ballots being mailed to Americans from a foreign country (5%), the RNC or DNC selecting a replacement candidate for president before Election Day (10%), stay-at-home orders preventing voters from going to the polls on Election Day in one or more large cities (20%), or Russian hackers crippling voter registration and election systems in one or more states (22%). (Thirteen other scenarios that experts rated in the prior wave remain possible, though most appear exceedingly unlikely.)

The overall results of expert forecasts are summarized in the figure below, which indicates that experts performed relatively well among events they rated as having a high likelihood of taking place (six of eight events took place that they rated as having a 70% chance or better). However, seven other events that they predicted as having a 5–55% chance of taking place did not occur.

Expert forecast accuracy: October 2020 probability estimate



Our November expert survey included 23 nightmare scenarios — nine repeated from the October survey that could still occur and others that we introduced as options on this November survey for the first time. The full list of scenarios evaluated in this wave is available in the appendix. The next figure below reports the median probability estimate and density of expert probability estimates across the 0–100% range for each scenario. Items are listed in descending order of estimated median likelihood. The experts rate twelve scenarios as more likely than not; the other eleven are regarded as substantially less likely, with median estimates of 35% or lower. The probability distributions are shaded red for high-probability items and yellow for those rated less likely.

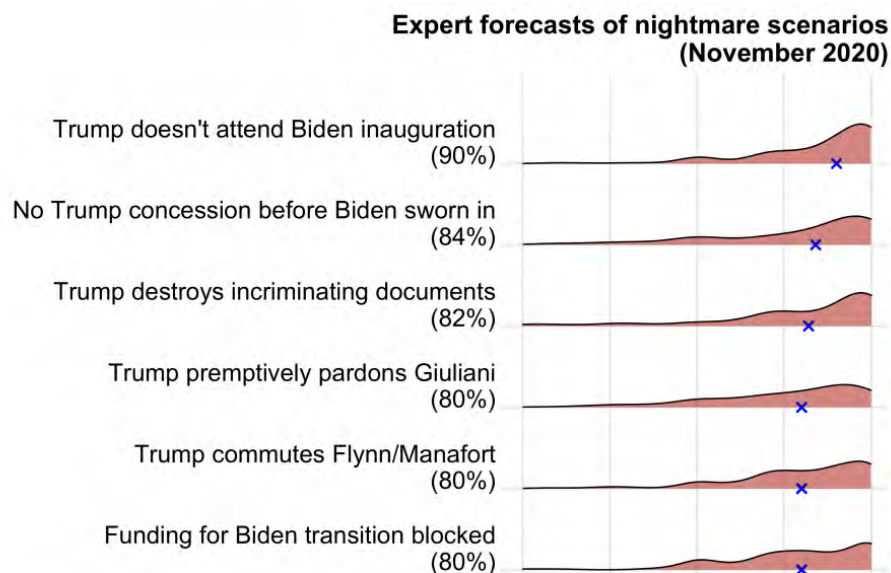
According to experts, the most likely events on the list are President Trump refusing to attend President-elect Biden's inauguration (90% median probability estimate) or to concede the election before that date (84%). By contrast, they view a scenario in which Senate Leader Mitch McConnell and House Minority Leader Kevin McCarthy refuse to acknowledge Biden's electoral win as far less likely (20%).

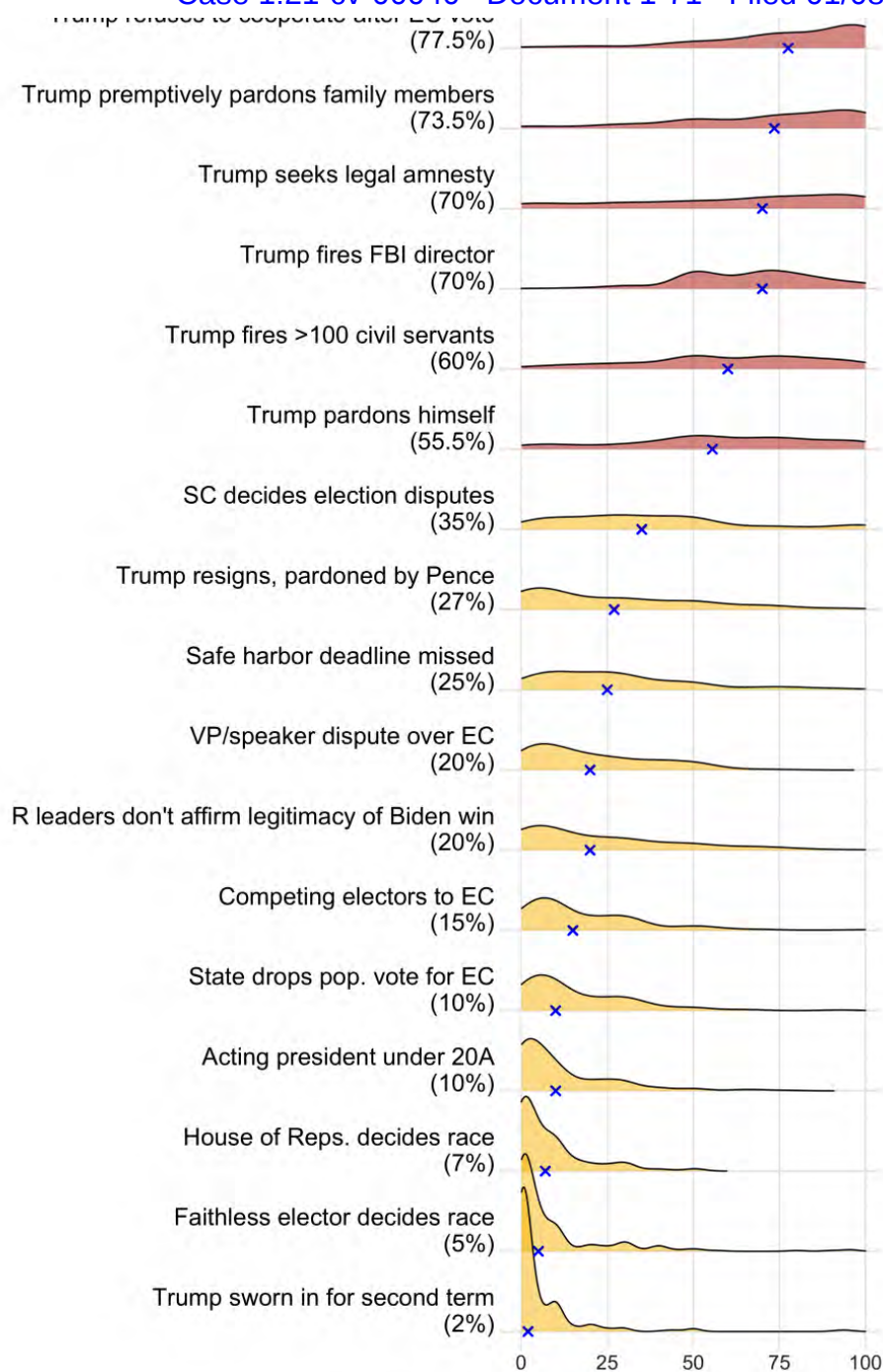
At the time of our survey, our experts expected Trump to obstruct a smooth transfer of authority, including blocking funding for Biden's transition team until the Electoral College vote or afterward (80%), refusing to cooperate with the transition until the Electoral College vote or afterward (78%), and firing over 100 senior civil servants

(60%). The administration did in fact block funding and authorization for the transition for three weeks after the election, but **relented** on that count only on November 23 rather than pressing the matter until the Electoral College vote.

The experts were also attuned to the legal precarity of President Trump and those around him, rating as likely that the president destroys incriminating documents before leaving the White House (82%); uses the pardon power preemptively on behalf of Rudi Giuliani (80%), members of his own family (74%), or even himself (56%); pardons or commutes the sentences of political allies Michael Flynn and/or Paul Manafort (80%), and seeks legal amnesty for himself and family members (70%). Here again, just as our survey completed, Trump validated one of these forecasts by **pardoning Michael Flynn** on November 25. Another pardon scenario was rated as much less likely by our experts, however — the median forecast for President Trump resigning before January 20 and then being pardoned by Mike Pence is only 27%.

Various scenarios associated with indeterminate and contested election outcomes are now seen as unlikely by experts. The highest probabilities were assigned to the Supreme Court intervening to decide one or more election-related disputes (35%) or one or more states failing to appoint electors before the December 8 safe harbor deadline (25%). Less likely still are scenarios in which one or more states send competing slates of electors to Congress (15%) or one or more state legislatures abandon the popular vote as a basis to appoint electors (10%).



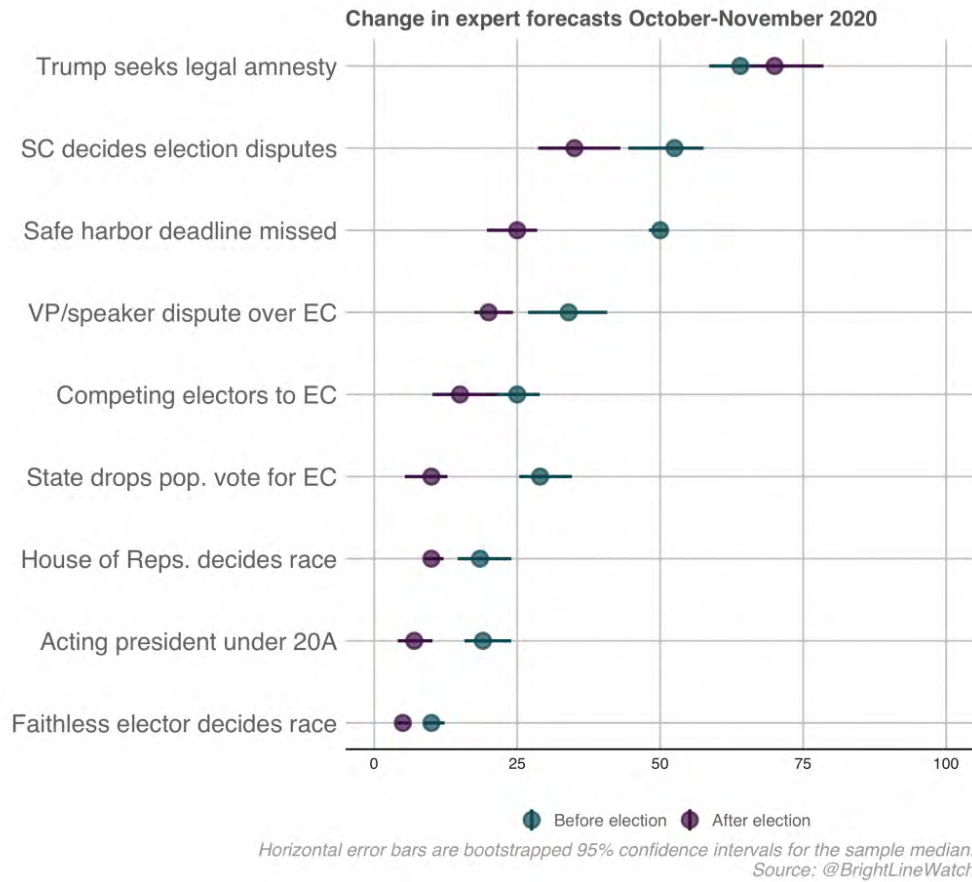


Blue crosses and numbers in parentheses denote medians.
Densities normalized to fall within range of data. Source: @BrightLineWatch

Scenarios involving Electoral College indeterminacy — a dispute between the Vice President and Speaker of the House, the appointment of an acting president, the determination of the presidency by the House of Representatives, or pivotal action by a faithless elector — are rated as even less likely. The least likely of our 23 scenarios, however, is Trump being sworn in for a second term, which gets a median probability of 2%.

A clear pattern emerges from these responses. The experts expect non-compliance from President Trump in the orderly transfer of authority to a Biden administration. They expect legal machinations around the pardon authority and possible amnesty for at least members of the Trump family and inner circle. They do not, however, regard Joe Biden's victory or his eventual path to the presidency to be in serious doubt. Based on the pattern from October, we expect a number of the scenarios rated as most likely by experts to take place but relatively few of those rated as having a low or intermediate probability.

We repeated nine of the 28 nightmare scenarios from the October survey in November. Most of these scenarios refer to aspects of the process by which the state-level popular vote is converted into a presidential election outcome — for example, a state missing the safe harbor deadline for selecting its presidential electors on December 8 or sending competing slates of electors to Congress later in the month. On the whole, our experts' sense of alarm about the election has declined, with probability estimates for every election-related item declining between our October and November surveys. The figure below shows the median estimate and 95% confidence interval for each scenario in declining order of their estimated likelihood.

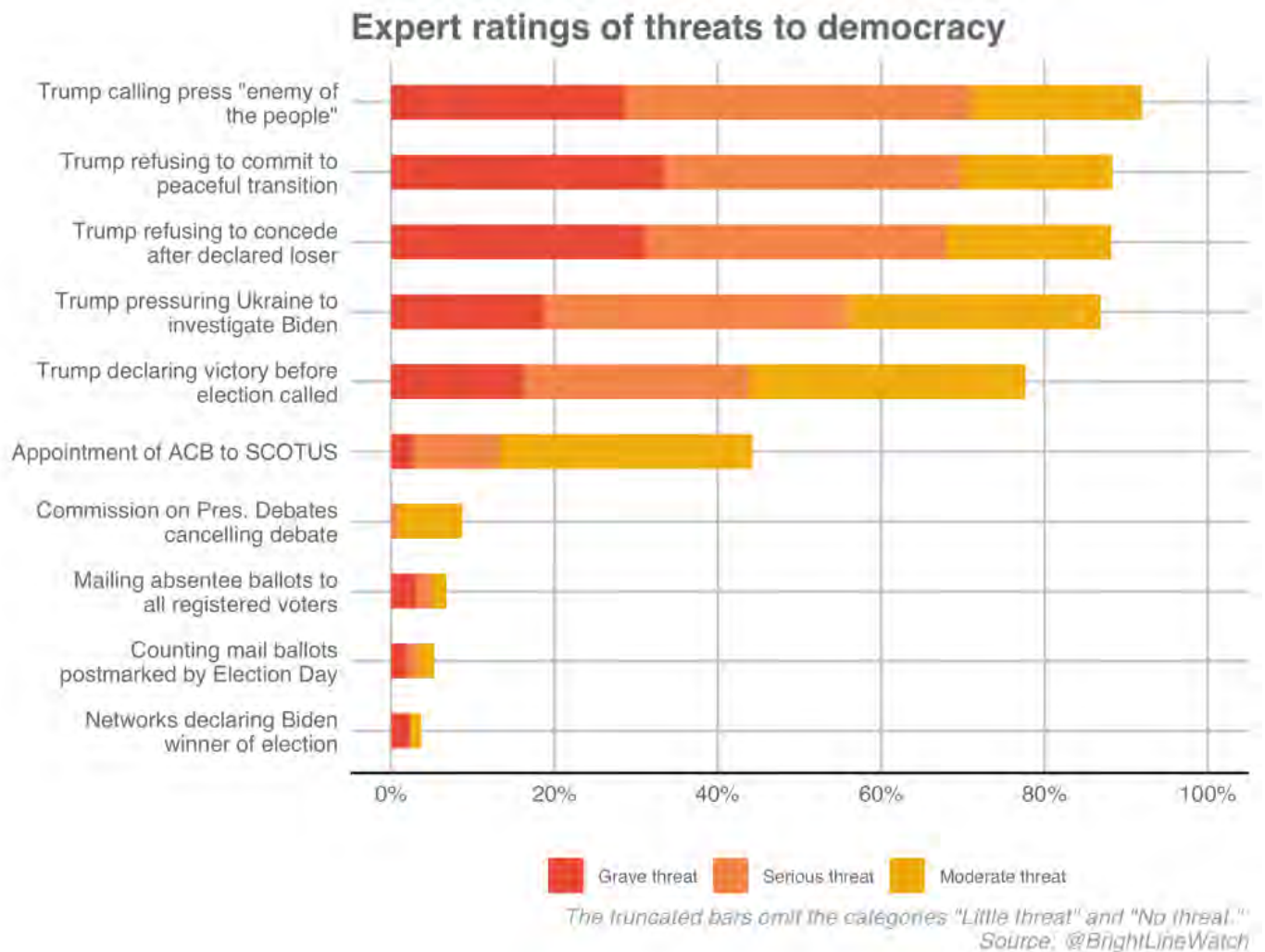


Concern among experts declined in almost every case, including that the Supreme Court would intervene to resolve an election dispute (53% to 35%), that a state would miss the safe harbor deadline (50% to 25%), that a state would abandon the popular vote as the basis for naming its electors (29% to 10%), or that an acting president would be appointed under the 20th Amendment (19% to 10%). The only item that does not decline from October to November relates to President Trump's legal status. Expert expectations that Trump would seek legal amnesty for himself and family members during the transition rose slightly from 64% in our October pre-election survey to 70% in the post-election survey.

Threats to democracy

Our November survey included a new battery that asked the experts to gauge the threat, if any, to American democracy posed by ten noteworthy events. Respondents were asked to rate each event as a grave threat, a serious threat, a moderate threat, little threat, or no threat to democracy. The bar graph below lists the events in order of

the total proportion of experts that rated each threat as either grave (red), serious (orange), or moderate (yellow).



Despite bitter [criticism](#) from the Trump administration, experts do not regard media outlets [declaring Biden](#) the winner of the election as a peril to democracy. Similarly, few see distributing mail ballots to all registered voters in some states or counting them if mailed by election day as threats. Although [unprecedented](#), few experts regard the cancellation of a presidential debate as a hazard to our system of government either. All of these events were decried by Trump, but experts perceive little or no threat.

The appointment of Amy Coney Barrett to the Supreme Court raised somewhat greater alarm among experts. Barrett's nomination and confirmation in the last weeks before the election attracted howls from President Trump's opponents, who denounced the move as a [power grab](#) and [constitutional hardball](#). The appointment spurred [calls](#) for

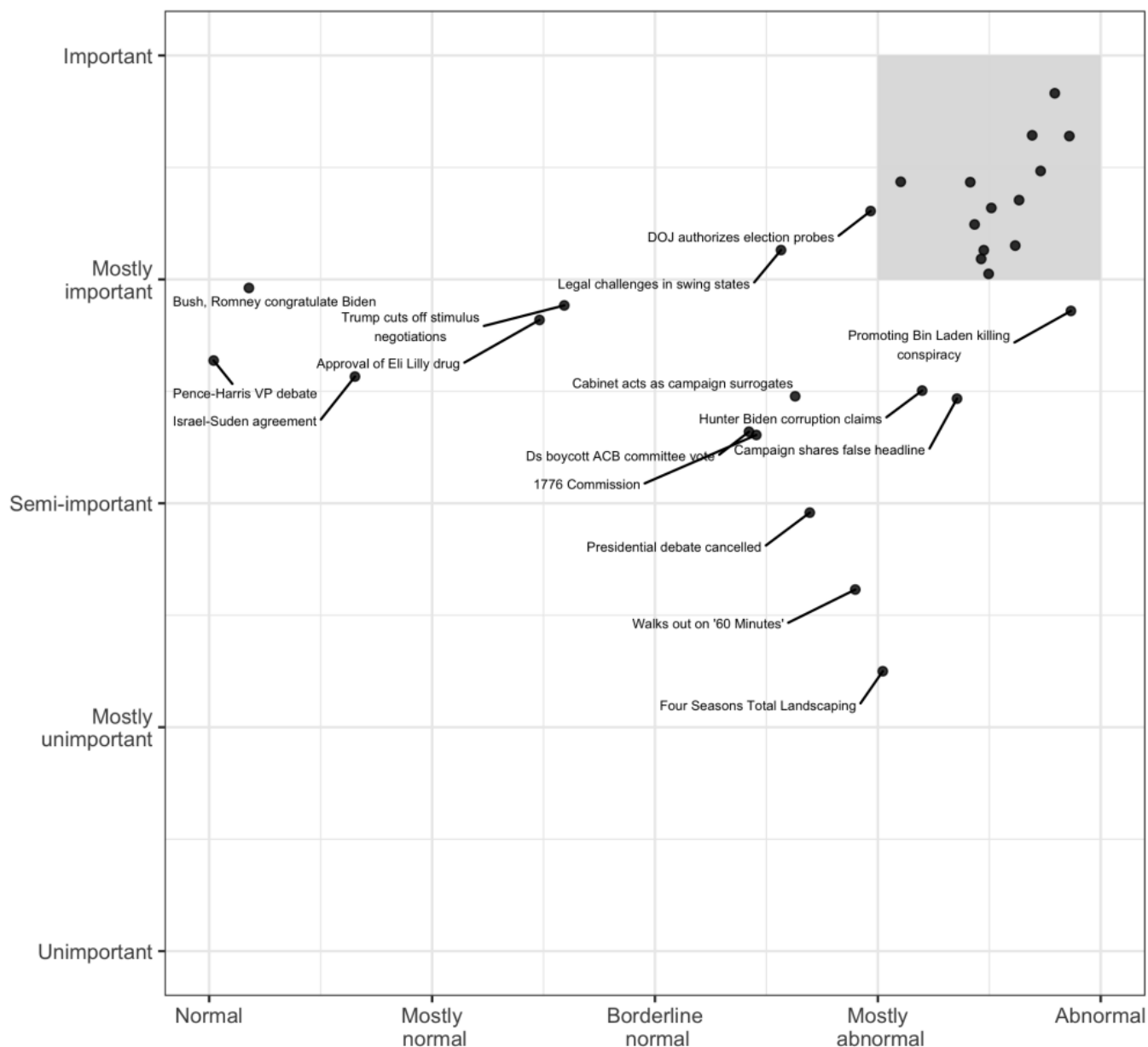
Supreme Court expansion among Democrats anticipating that the election would return control of the Senate as well as the presidency. Despite this outcry, however, most experts were not seriously concerned over Barrett's appointment — 55% rated it as posing little or no danger to democracy, though 31% rate it as a moderate threat, 11% as a serious threat, and 3% as a grave threat.

The events that experts saw as more threatening to democracy all pertain to President Trump's conduct in office. Some predate the election. For instance, we asked experts to rate Trump's July 2019 attempt to pressure Ukrainian President Volodymyr Zelensky into investigating Joe Biden. Nineteen percent rated that event, which prompted Trump's impeachment by the House of Representatives, as a grave threat to democracy, while 37% regarded it as a serious threat and 31% rated it as a moderate threat. Experts were most alarmed, however, by Trump calling the press an "enemy of the people," an epithet he has repeated throughout his presidency. Seventy-one percent of experts described Trump's use of this smear as a grave or serious threat to democracy. These figures were nearly identical to those for Trump's refusal to commit to a [peaceful transition](#) of power (70% of experts rated as grave or serious) and his related [refusal to concede](#) after Biden was projected to be the winner (68% grave or serious). These judgments reflect an expert consensus that freedom of the press and the peaceful transfer of power via elections are bedrocks of democracy; Trump's refusal to honor these principles is seen to place that foundation in jeopardy.

The importance and normalcy of events in October and November 2020

As in prior surveys, we asked our experts to separately assess the importance and normalcy of notable events that took place since our last report. Although our previous survey was conducted only one month earlier, there was no lack of material. Results are presented in the figures below. The events of greatest concern are those situated in the upper-right quadrant. These events are ones that experts deem highly unconventional *and* consequential; these are often major departures from democratic norms.

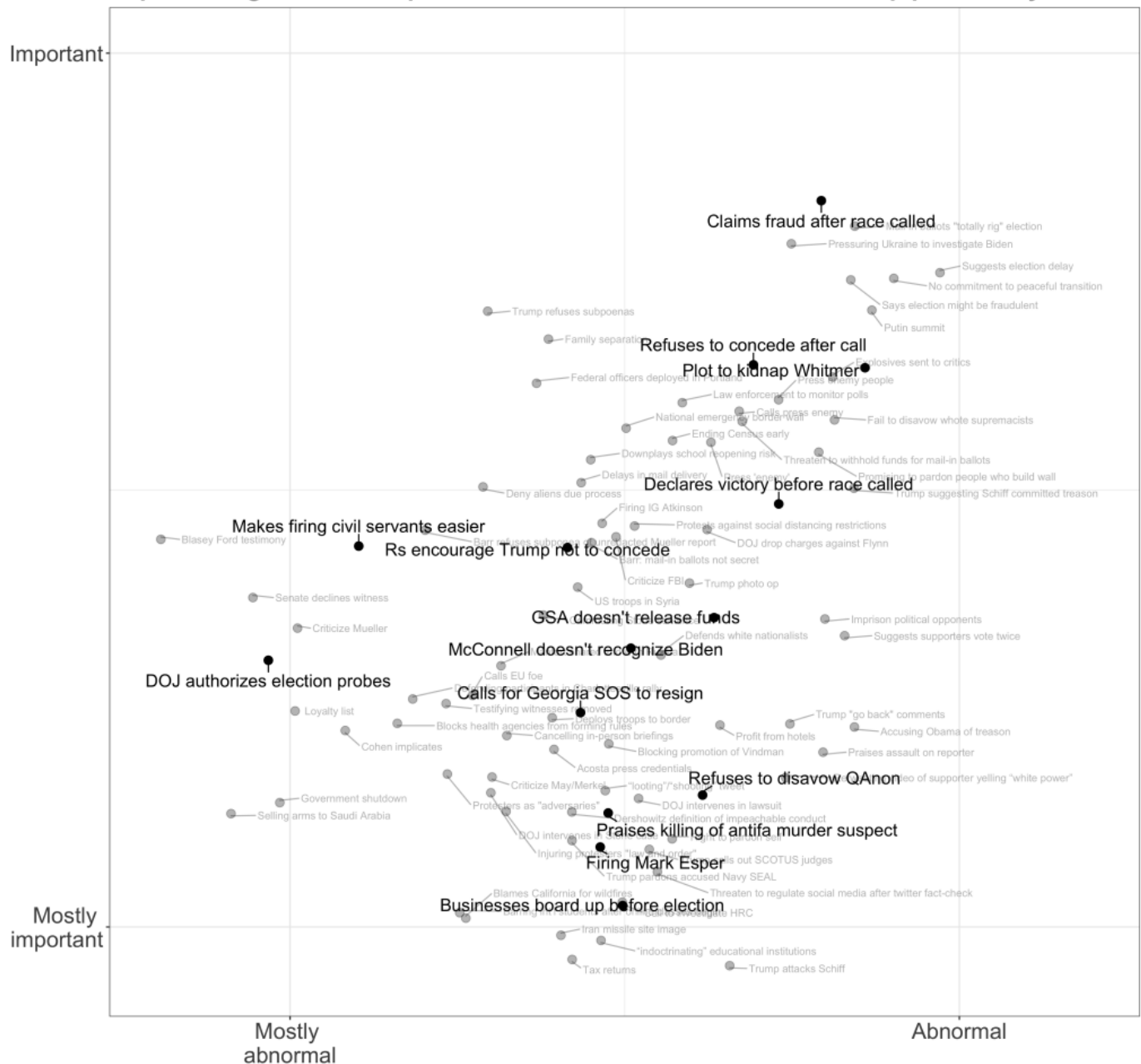
Expert ratings of recent events in Trump presidency



Each point is the mean rating of experts surveyed by Bright Line Watch in November 2020 for the corresponding event.
Source: @BrightLineWatch

To provide greater clarity, the figure below provides a magnification of the top right sector highlighted in gray above, labeling the densely clustered items (labels in black) and superimposing them over items rated in that same top right sector in previous survey waves. These are the events that took place during the Trump administration that experts rated as most abnormal and important.

Expert ratings of most important and abnormal events of the Trump presidency

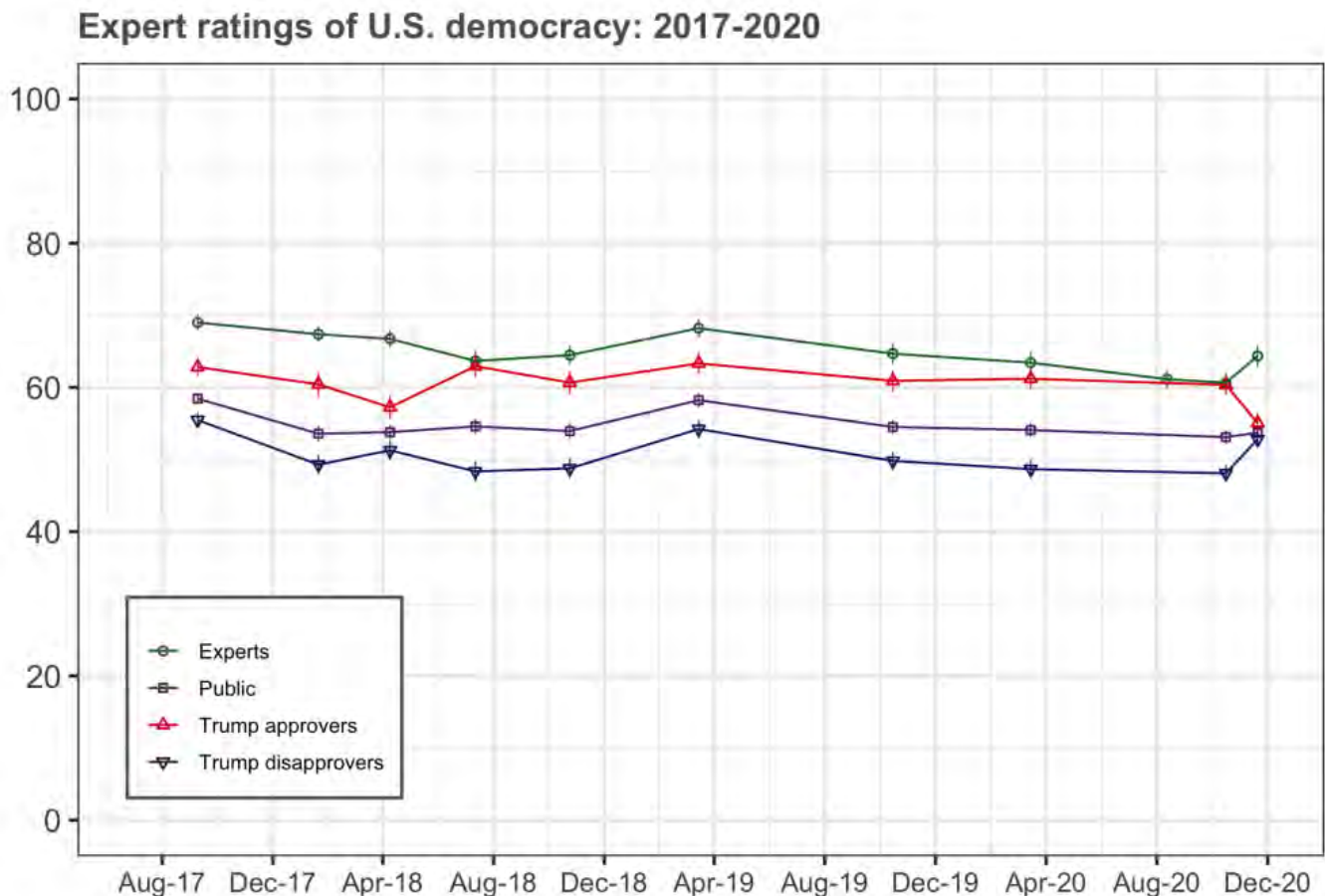


None of the events from October and November broke ground in their *abnormality* alone. The most abnormal events to date in our data include Trump's suggestion of a delay in the 2020 election; his refusal to commit to a peaceful transition of power; and the Helsinki summit in which Trump sided with Russian President Vladimir Putin in rejecting U.S. intelligence of Russia's interference in the 2016 election. However, experts rate President Trump's persistent claims of widespread election fraud after the presidential election was called for Biden as *the most important event of his presidency* that is also highly abnormal. Here again, our expert responses highlight the premi-

um they place on consensus recognition of core democratic procedures and electoral authority. The way Trump is using baseless claims of fraud to deny the legitimacy of his defeat in a free and fair election presents a direct threat to democratic stability.

Democratic performance as evaluated by the public and the experts

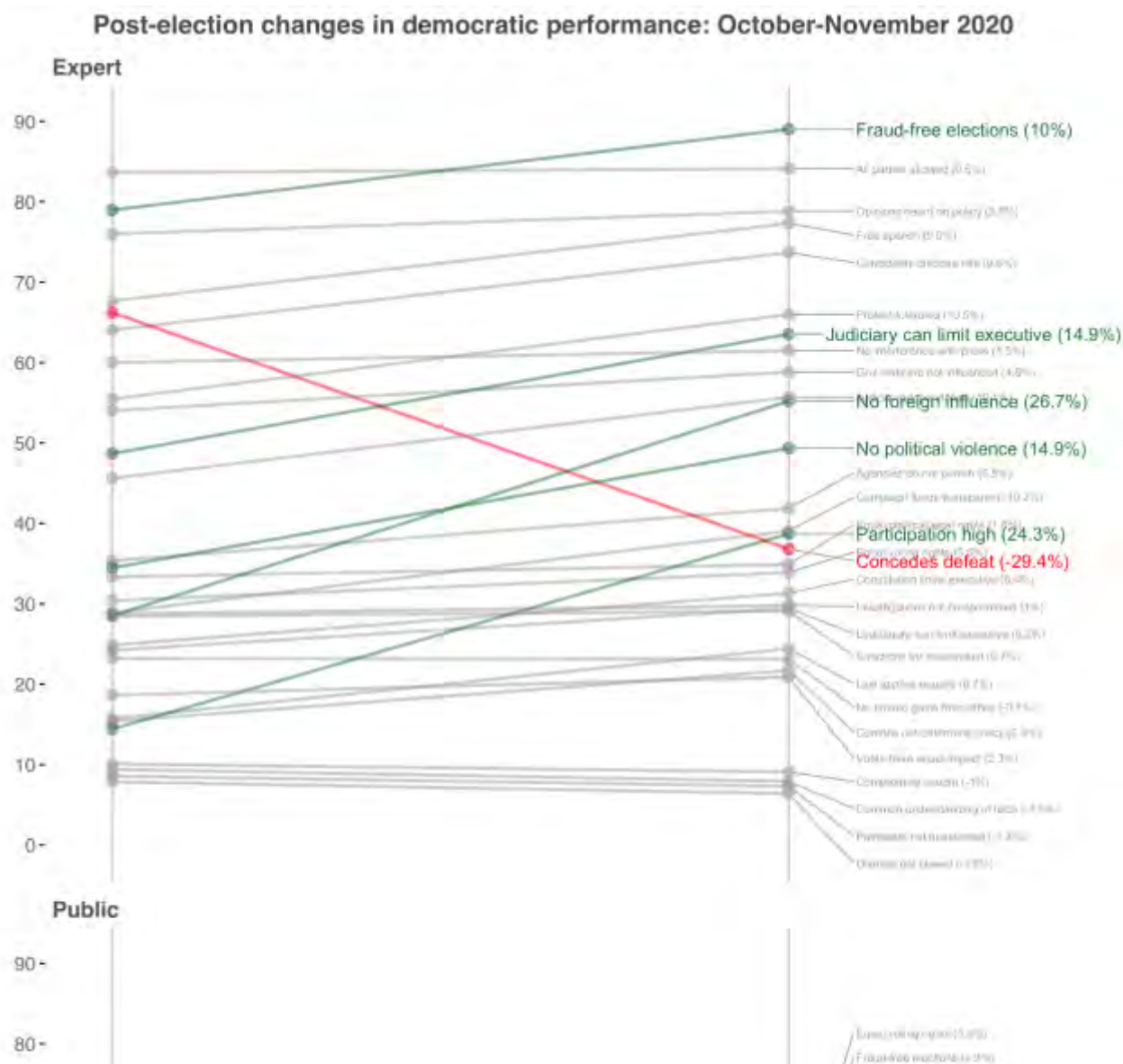
As in previous surveys, we asked both expert and public respondents to assess the quality of U.S. democracy overall and to evaluate its performance on thirty distinct democratic principles (see Appendix for the complete list). The figure below shows mean evaluations of the overall quality of U.S. democracy on a 0–100 scale among experts (green line) and the public (purple line). It also separately plots responses among the public from Trump approvers (red line) and disapprovers (blue line).

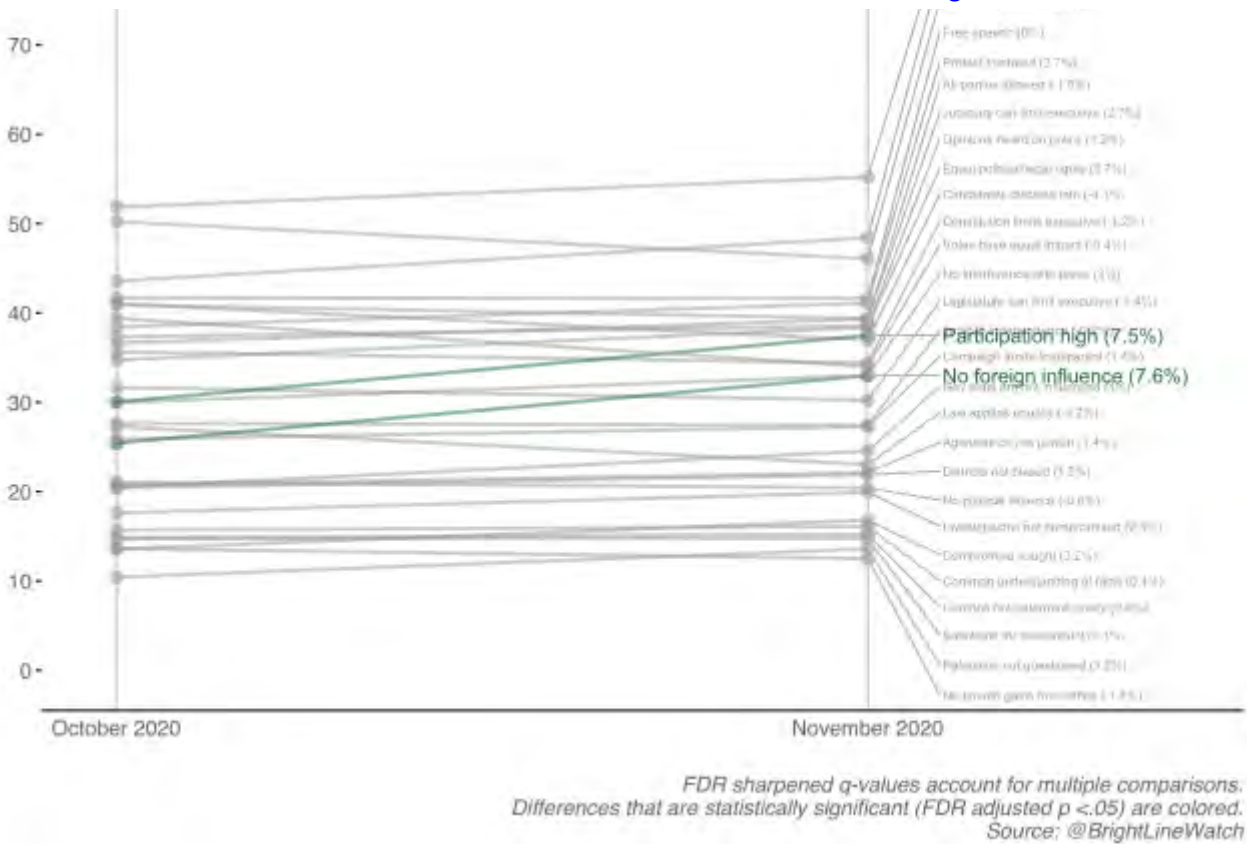


Ratings of U.S. democracy by the public and experts on a 0-100 scale. Figure shows mean values across thirteen survey waves. Vertical error bars are 95% confidence intervals. Source: @BrightLineWatch

The 2020 election improved perceptions of U.S. democracy among both the public and experts. The mean rating on a 0–100 scale nudged up from 53.1 to 53.7 among the public from October to November and from 60.6 to 64.4 among experts. Unsurprisingly, though, this pattern differed sharply between members of the public who approve of Trump and those who do not. Trump supporters rated U.S. democracy lower (declining from 60.4 to 55.1) while opponents rated it higher (increasing from 48.1 to 52.8).

The next figures turn attention to our thirty democratic principles, showing the percentage of respondents who indicated that the U.S. “mostly meets” or “fully meets” each principle in our October (left side) and November (right side) surveys. The lines illustrate changes from one survey to the next, with statistically significant improvements highlighted in green and declines in red.



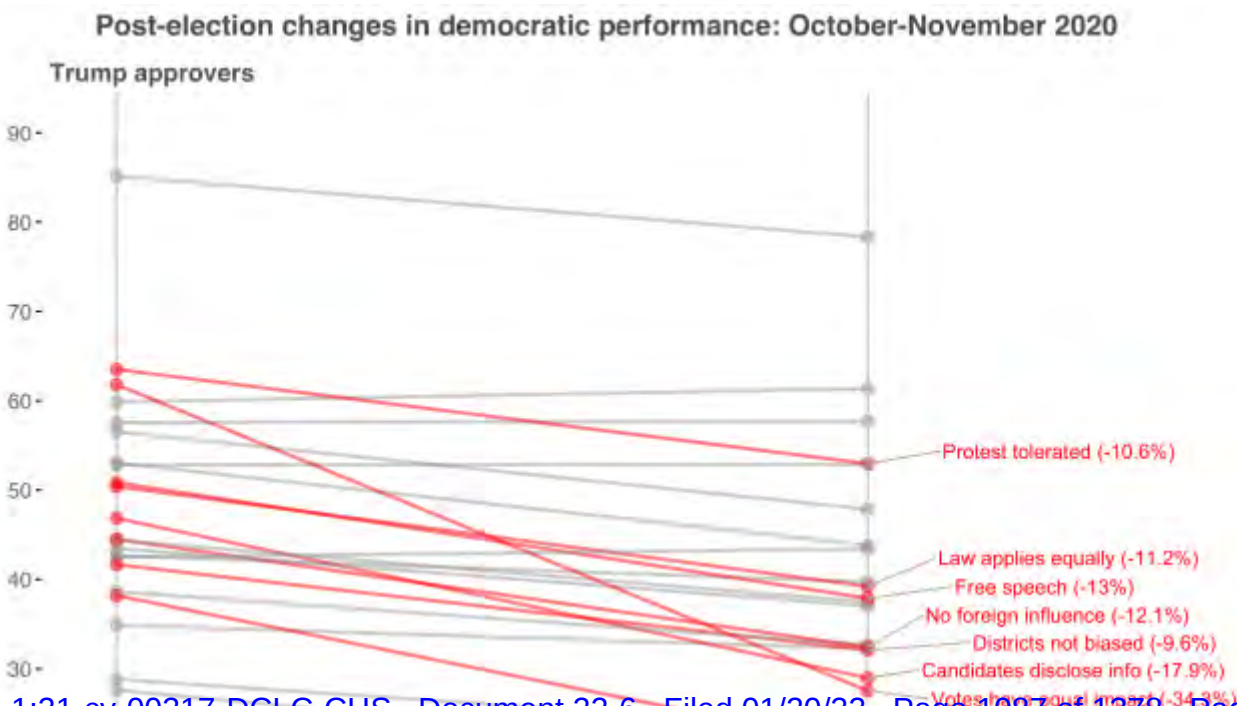


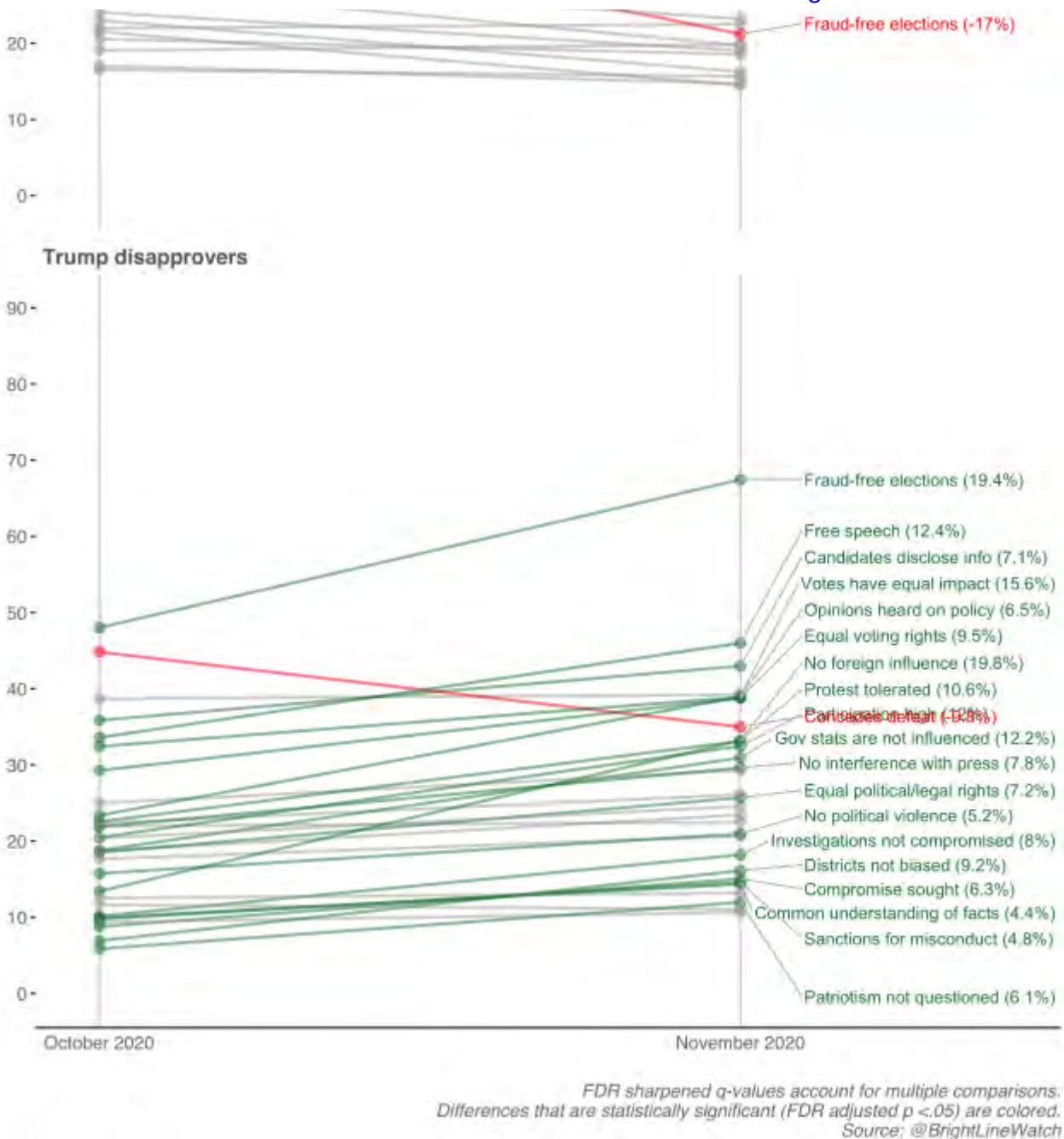
Among experts, we see a measurable decline in democratic performance on only one principle — that politicians who lose free and fair elections will concede defeat — and sharp upticks on some principles related to elections, including elections being free from foreign influence (from 29% to 55%) and participation levels being high (from 14% to 39%). November’s survey also saw a substantial improvement in expert assessments that citizens are protected from political violence by private actors, which may reflect the lack of violence surrounding the November election as well as a rebound from the October survey, which followed shootings at protests in Wisconsin and Oregon earlier in the fall.

Among the public, evaluations of performance on democratic principles were relatively stable. We observe significant changes from October to November on only two items — that participation should be high and elections protected from foreign influence. Assessments improved on both principles. Positive evaluations of US performance on participation comes in the wake of the [highest turnout](#) in more than a century, with an estimated 66.5% of eligible voters casting ballots. The improved assessment on foreign influence reflects pre-election concerns [not being borne out](#).

When we separate public respondents by approval of President Trump in the figure below, however, the picture changes radically. Trump supporters perceive measurable declines on seven items: protections for free speech, individuals' right to protest, and from foreign influence in elections, that candidates disclose sufficient information for voters to know how they will govern, that electoral districts do not systematically favor one party, that all votes have equal impact, and that elections are free of fraud. The last claim likely indicates that President Trump's stream of claims about electoral fraud are resonating with his supporters, despite the failure of the president and his legal team to provide any evidence that withstands judicial scrutiny.

We find a steep drop in Trump approvers' belief in all votes being counted equally, from 62% in October to 28% in November. This drop is puzzling. It is well documented, of course, that all votes do not count equally. Votes from less-populated states are, in effect, more heavily weighted both in presidential elections via the [Electoral College](#) and in the Senate because of that chamber's [malapportionment](#). In House elections, Republicans are [advantaged in more states by gerrymandering](#) than are Democrats and enjoy structural advantages in districting due to greater [geographic concentration](#) among Democrats. As a result, Republicans enjoy success that is disproportionate to their vote share in contests for every federal office. The president's supporters are presumably not embracing these facts but instead expressing dissatisfaction that their votes were not enough to keep Trump in the White House.





The picture among Trump's opponents looks dramatically different. Like the experts, they perceive a decline in democratic performance on one principle — that losing candidates concede elections — but on 19 of the remaining 29 items their assessments rose by statistically significant margins. The greatest improvements were observed for confidence that elections are free of fraud, which rose more (19 percentage points) than perceived performance on the same item declined among Trump supporters (17 points). The list of other items in which performance increased significantly includes those connected to elections (equal voting rights, equal impact, no foreign influence) and also some that pertain to norms of behavior (seeking compromise with oppo-

nents, respecting one's adversary's patriotism). In general, Trump's opponents viewed U.S. performance on numerous democratic principles more positively in the weeks following the election.

Appendix

Bright Line Watch surveys on the state of America's democracy, November 2020

From November 12–25, 2020, Bright Line Watch conducted its thirteenth survey of academic experts, and tenth of the general public, on the quality of democracy in the United States. Our public sample consisted of 2,700 survey participants from the YouGov sample who were selected and weighted to be representative of the U.S. adult population. We also surveyed 561 political science experts across a diverse range of subfields (5% of solicited invitations). Our email list was constructed from the faculty list of U.S. institutions represented in the online program of the 2016 American Political Science Association conference and updated by reviewing department websites and job placement records from Ph.D. programs in the period since.

All estimates shown in the report used weights provided by YouGov. Our expert sample is traditionally unweighted because we do not collect demographic data to protect anonymity. Error bars in our graphs represent 95% confidence intervals. Data are available [here](#).

Both the expert and public samples in Wave 13 responded to a battery of questions about democratic performance in the United States. Afterward, they were asked to evaluate the quality of American democracy overall on a 100-point scale. Experts were also asked to evaluate the quality of democracy in their state on the same 0–100 scale. Expert respondents were then asked to respond to two additional batteries: one in which they were presented with a list of political events and asked to rate them on normalcy and importance, another in which they were asked to evaluate hypothetical scenarios related to the 2020 Presidential Election (lists of both are below), and a final set of questions about the degree to which select events posed a threat to democracy.

Nightmare Scenarios

Respondents were asked to assess the chances that each one of the following scenarios will occur.

- 1. President Trump attempts to negotiate legal amnesty for himself and his family after the election.
- 2. One or more states send competing slates of electors to the Electoral College.
- 3. One or more states are unable to resolve an election dispute before the safe harbor deadline.
- 4. A dispute over the results of the election creates a conflict between the Vice President and the Speaker of the House over accepting Electoral College votes.
- 5. A conflict over Electoral College votes causes the appointment of an acting president under the terms of the Twentieth Amendment on January 20, 2021.
- 6. One or more legal disputes over the election are decided by the U.S. Supreme Court.
- 7. One or more state legislatures enact a bill that would overturn the statewide popular vote as an allocation mechanism for electors and/or stop the counting of ballots.
- 8. A faithless elector decides the presidency.
- 9. The presidential election is decided by the House of Representatives.
- 10. The Trump administration destroys documents that might implicate the White House in wrongdoing.
- 11. President Trump refuses to cooperate on the presidential transition with the incoming Biden administration after the Electoral College vote.
- 12. The Trump administration blocks government funding for the Biden transition until the Electoral College vote or afterward.
- 13. President Trump refuses to formally concede defeat before the inauguration.
- 14. President Trump pardons himself.
- 15. President Trump fires FBI director Christopher Wray.
- 16. President Trump pardons or commutes the sentences of Michael Flynn and/or Paul Manafort.
- 17. President Trump preemptively pardons family members.
- 18. President Trump preemptively pardons Rudy Giuliani and/or employees of the Trump organization.
- 19. President Trump resigns and is pardoned by Mike Pence.
- 20. President Trump refuses to attend Joe Biden's presidential inauguration.
- 21. President Trump fires more than 100 senior civil servants before the inauguration.
- 22. Republican Senate leader Mitch McConnell and House Minority Leader Kevin McCarthy fail to acknowledge Joe Biden as the legitimate winner of the election even after Biden is inaugurated in January 2021.
- 23. President Trump is sworn in for a second term on January 20, 2021.

Events

- 1. President Trump declaring he won the election before the race had been called
- 2. President Trump refusing to concede defeat after being declared loser of the election
- 3. President Trump claiming widespread fraud after being declared loser of the election
- 4. Rudy Giuliani holding a press conference at Four Seasons Total Landscaping
- 5. President Trump creating the 1776 Commission to promote “patriotic education”
- 6. GSA administrator declining to release funds to Biden transition
- 7. George W. Bush and Mitt Romney congratulating Biden on presidential victory
- 8. Trump campaign posting doctored newspaper headline declaring Gore 2000 victor
- 9. The Commission on Presidential Debates cancelling the October 15 debate
- 10. Senate Democrats boycotting Amy Coney Barrett’s Judiciary Committee vote
- 11. President Trump firing Secretary of Defense Mark Esper after the election via tweet
- 12. President Trump abruptly ending a ‘60 Minutes’ interview with Lesley Stahl
- 13. Lindsey Graham, Ted Cruz, and other Republican officials encouraging Trump not to concede
- 14. The Trump campaign filing legal challenges in swing states after election is called
- 15. President Trump signing an executive order making it easier to fire federal civil service employees
- 16. Rudy Giuliani obtaining Hunter Biden’s laptop and promoting corruption claims against him
- 17. Attorney General Bill Barr authorizing DOJ to probe “clear and apparently-credible allegations” of election irregularities if they exist
- 18. David Perdue and Kelly Loeffler calling for the Georgia Secretary of State, a Republican, to step down
- 19. Mitch McConnell declining to recognize Biden as president-elect in floor speech after race called
- 20. President Trump deploying members of his cabinet as campaign surrogates before election
- 21. President Trump cutting off negotiations for stimulus package and blaming Pelosi for the impasse
- 22. Mike Pence and Kamala Harris participating in the vice presidential debate
- 23. President Trump helping to facilitate peace agreement between Sudan and Israel
- 24. FDA providing emergency authorization for Eli Lilly’s experimental antibody drug to treat COVID-19
- 25. President Trump promoting conspiracy theory that Osama Bin Laden killing was a hoax
- 26. President Trump praising U.S. marshals killing antifa murder suspect in Portland
- 27. President Trump refusing to disavow QAnon
- 28. Right-wing militia members in Michigan plotting to kidnap Gov. Gretchen Whitmer
- 29. Businesses board up in major cities fearing post-election violence and protests

Threats to democracy

We then asked respondents to evaluate the extent of the threat to the quality and stability of American democracy posed by the following events.

- 2. President Trump refusing to concede defeat after being declared loser of the election.
- 3. President Trump refusing to commit before the election to a peaceful transition of power.
- 4. President Trump pressuring Ukraine to investigate Joe Biden.
- 5. President Trump calling the press an “enemy of the people.”
- 6. Networks, including Fox News, declaring Joe Biden the winner of the presidential election.
- 7. The Commission on Presidential Debates cancelling the October 15 debate.
- 8. The appointment of Amy Coney Barrett to the Supreme Court.
- 9. The practice of mailing absentee ballots to all registered voters.
- 10. The practice of counting mail ballots postmarked by Election Day even if received afterward.

Democratic principles

The foundation of Bright Line Watch’s surveys is a list of 30 statements expressing a range of democratic principles (the full list is provided below). Democracy is a multidimensional concept. Our goal is to provide a detailed set of measures of democratic values and of the quality of American democracy. We are also interested in the resilience of democracy and the nature of potential threats it faces. Based on the experiences of other countries that have experienced democratic setbacks, we recognize that democratic erosion is not necessarily an across-the-board phenomenon. Some facets of democracy may be undermined first while others remain intact, at least initially. The range of principles that we measure allows us to focus attention on variation in specific institutions and practices that, in combination, shape the overall performance of our democracy.

Bright Line Watch’s Wave 1 survey included 19 statements of democratic principles. Based on feedback from respondents and consultation with colleagues, we expanded that list to 29 statements in Wave 2. We then reduced that set to a set of 27 statements for the Wave 3 through Wave 8 surveys. 17 of those 27 statements were included in Wave 1, and all 27 were included in Wave 2. We added one statement to the list in Wave 9. In Wave 12, we asked respondents to assess two additional principles:

- *The law is enforced equally for all persons*
- *Politicians who lose free and fair elections will concede defeat*

The full set of statements is presented below and grouped thematically for clarity. In the surveys, the principles were not categorized or labeled. Each respondent was shown a randomly selected subset of statements (14 for the public, 9 for experts) and asked to rate the performance of the United States on those dimensions.

Elections

- Elections are conducted, ballots counted, and winners determined without pervasive fraud or manipulation
- Citizens have access to information about candidates that is relevant to how they would govern
- The geographic boundaries of electoral districts do not systematically advantage any particular political party
- Information about the sources of campaign funding is available to the public
- Public policy is not determined by large campaign contributions
- Elections are free from foreign influence
- Politicians who lose free and fair elections will concede defeat

Voting

- All adult citizens have equal opportunity to vote
- All votes have equal impact on election outcomes
- Voter participation in elections is generally high

Rights

- All adult citizens enjoy the same legal and political rights
- Parties and candidates are not barred due to their political beliefs and ideologies
- Government protects individuals' right to engage in unpopular speech or expression
- Government protects individuals' right to engage in peaceful protest
- Citizens can make their opinions heard in open debate about policies that are under consideration
- The law is enforced equally for all persons

Protections

- Government does not interfere with journalists or news organizations
- Government effectively prevents private actors from engaging in politically-motivated violence or intimidation
- Government agencies are not used to monitor, attack, or punish political opponents

Accountability

- Government officials are legally sanctioned for misconduct
- Government officials do not use public office for private gain
- Law enforcement investigations of public officials or their associates are free from political influence or interference
- Government statistics and data are produced by experts who are not influenced by political considerations

Institutions

- Executive authority cannot be expanded beyond constitutional limits
- The legislature is able to effectively limit executive power
- The judiciary is able to effectively limit executive power
- The elected branches respect judicial independence

Discourse

- Even when there are disagreements about ideology or policy, political leaders generally share a common understanding of relevant facts
- Elected officials seek compromise with political opponents
- Political competition occurs without criticism of opponents' loyalty or patriotism

To measure perceived democratic performance, the survey asked, “How well do the following statements describe the United States as of today?” Each respondent was then presented with 14 statements of principle, randomly drawn from the set above, and offered the following response options:

- The U.S. does not meet this standard
- The U.S. partly meets this standard
- The U.S. mostly meets this standard
- The U.S. fully meets this standard
- Not sure

The order in which statements were presented in the battery was randomized for each respondent so there should be no priming or ordering effects in how they were assessed.

Appendix figures

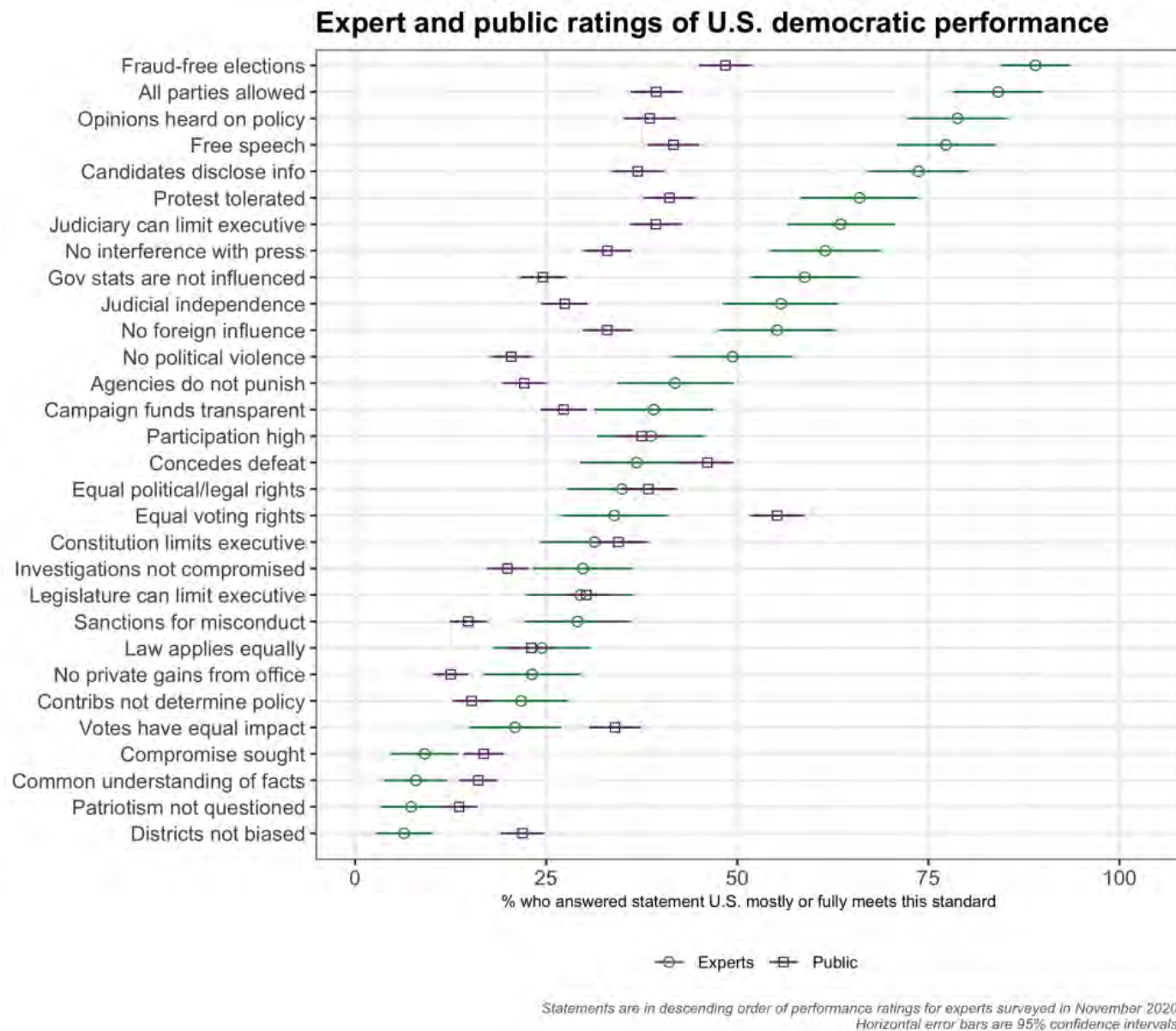


Figure 1

Public ratings of U.S. democratic performance by support for Trump

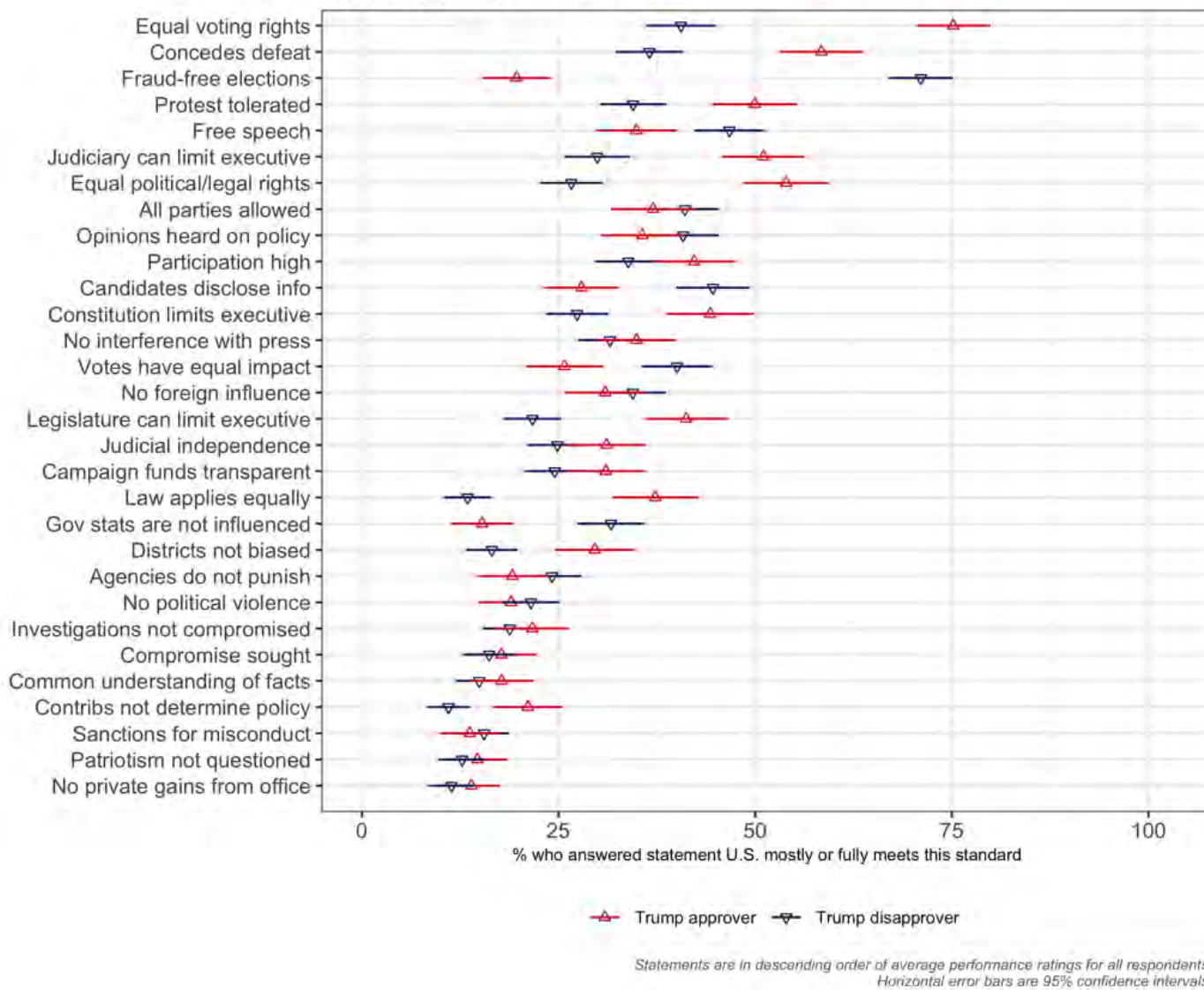
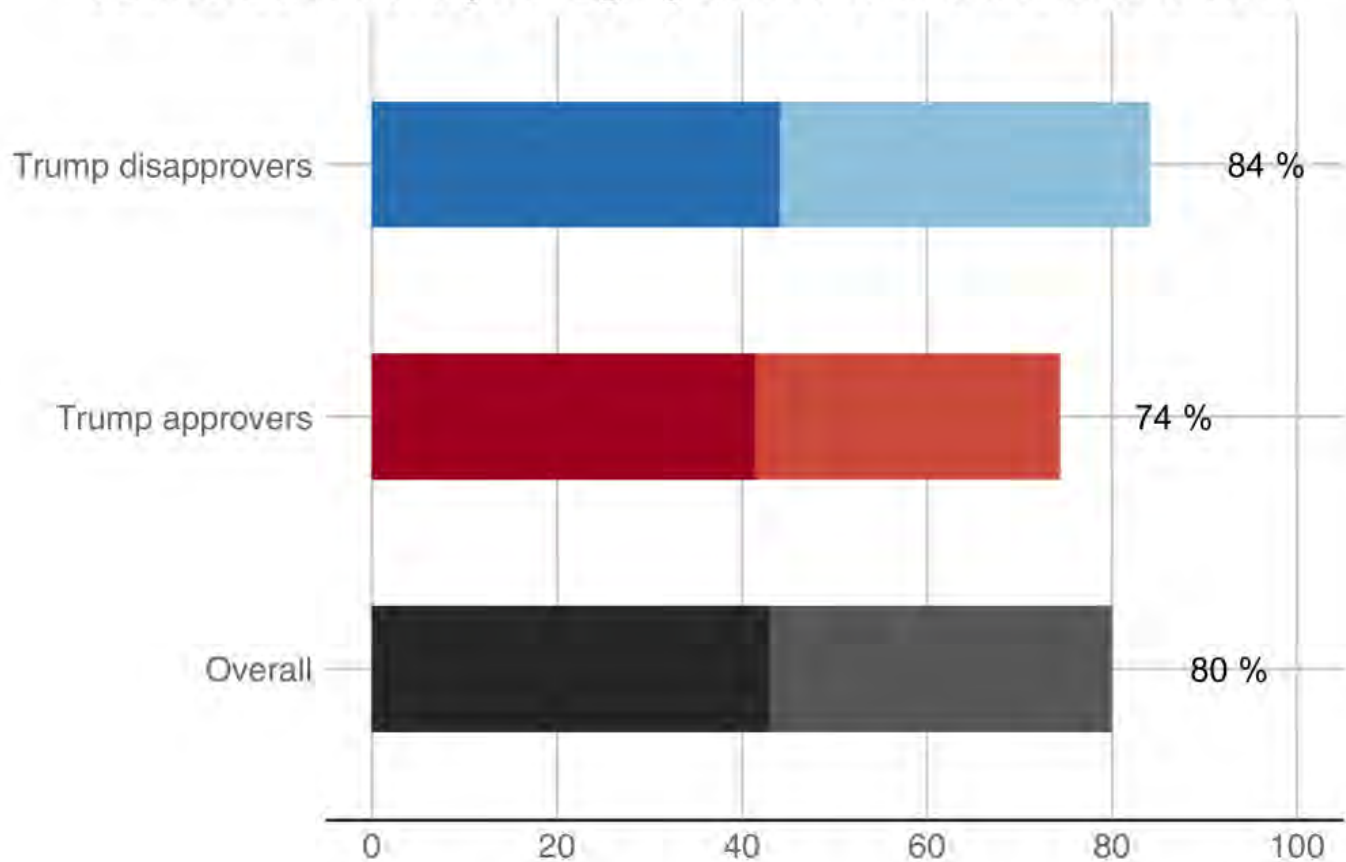


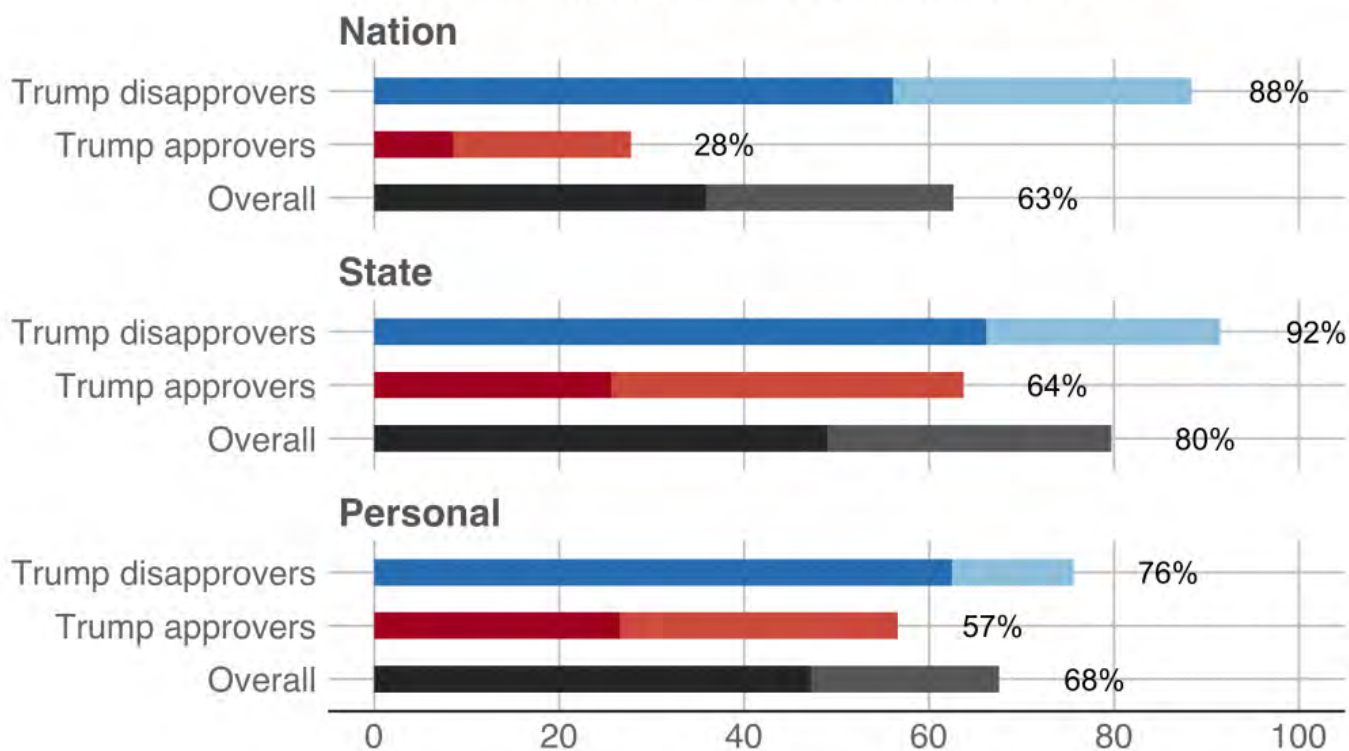
Figure 2

Confidence that everyone legally entitled to vote was able to do so



Darker shades are "Very confident" and lighter shades are "Somewhat confident."
Source: @BrightLineWatch

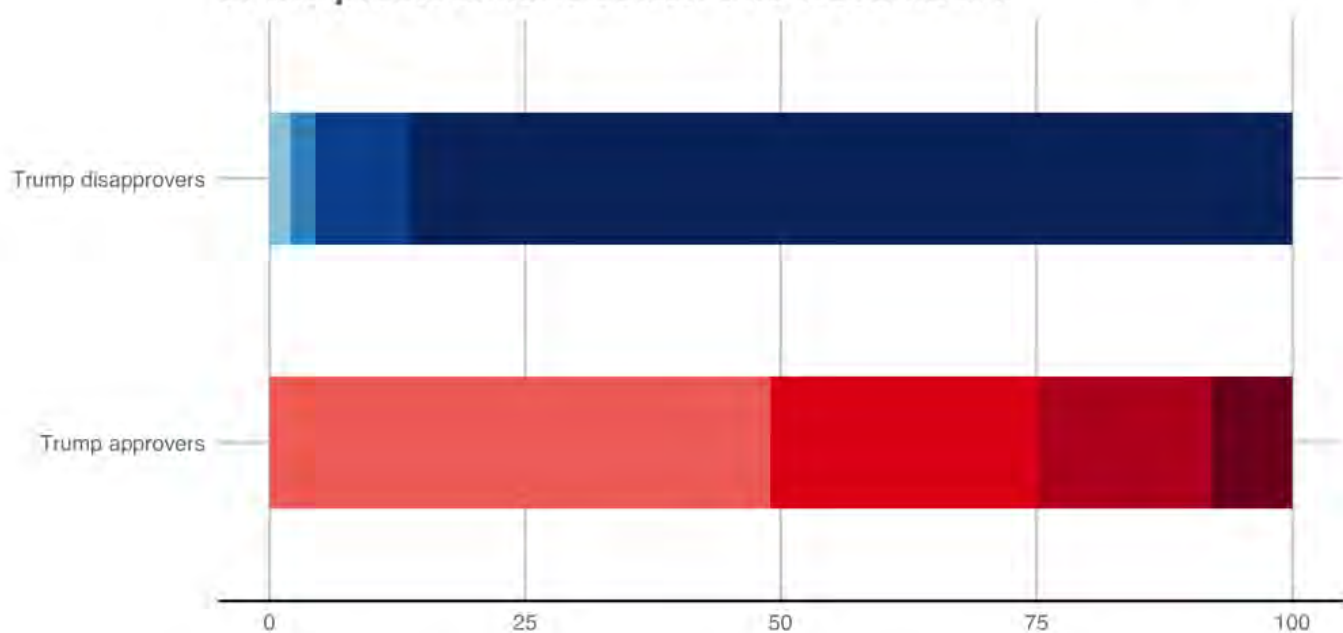
Figure 3

Confidence that votes were counted as intended

Darker shades are "Very confident" and lighter shades are "Somewhat confident."

Source: @BrightLineWatch

Figure 4

Do you consider Joe Biden to be the rightful winner of the presidential election this November?

Lightest to darkest shade: [Definitely not, Probably not, Probably, Definitely] the rightful winner.
Horizontal axis is percentage of respondents in each category.

Source: @BrightLineWatch

Figure 5

Proportion who consider Biden to be the rightful winner

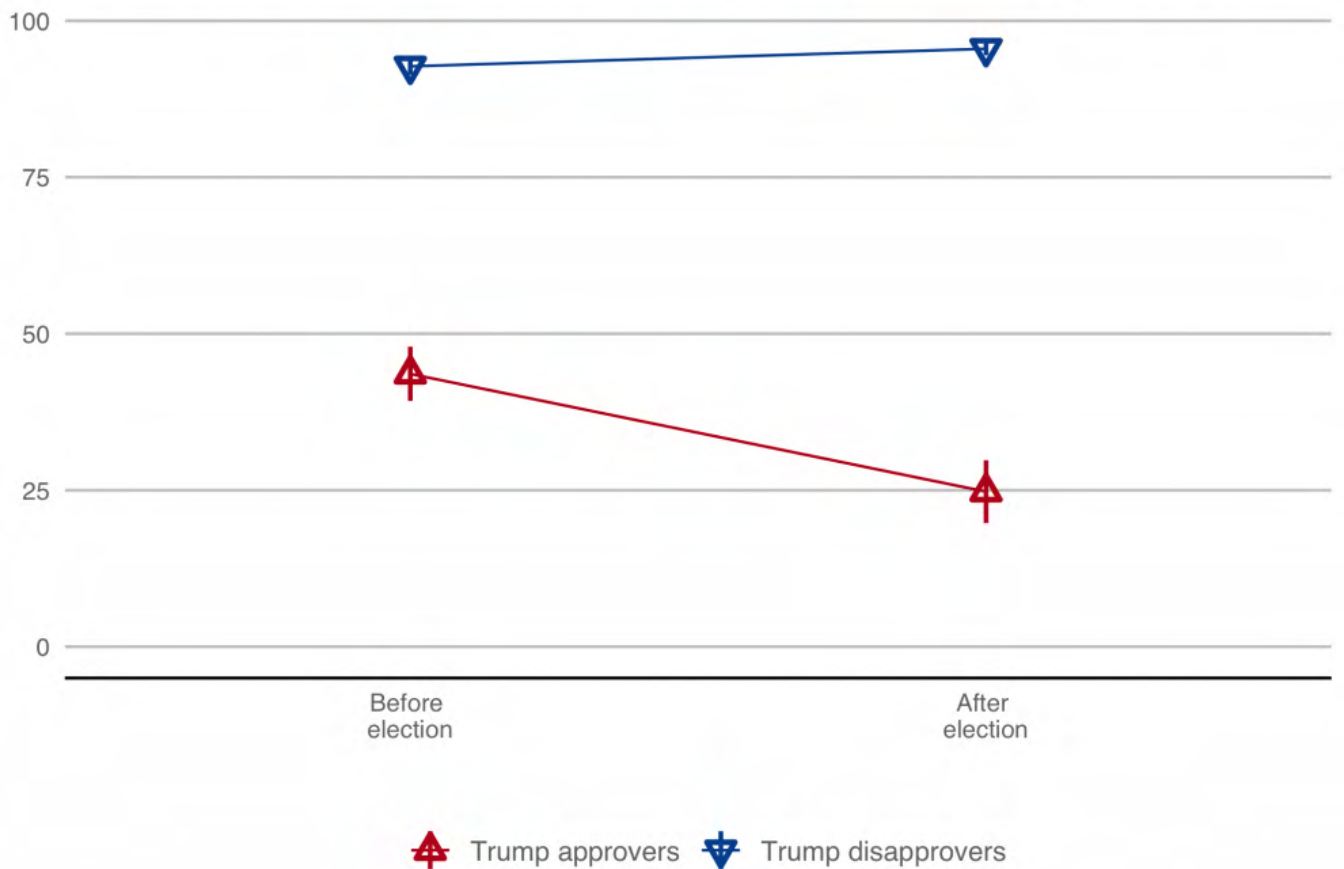


Figure 6

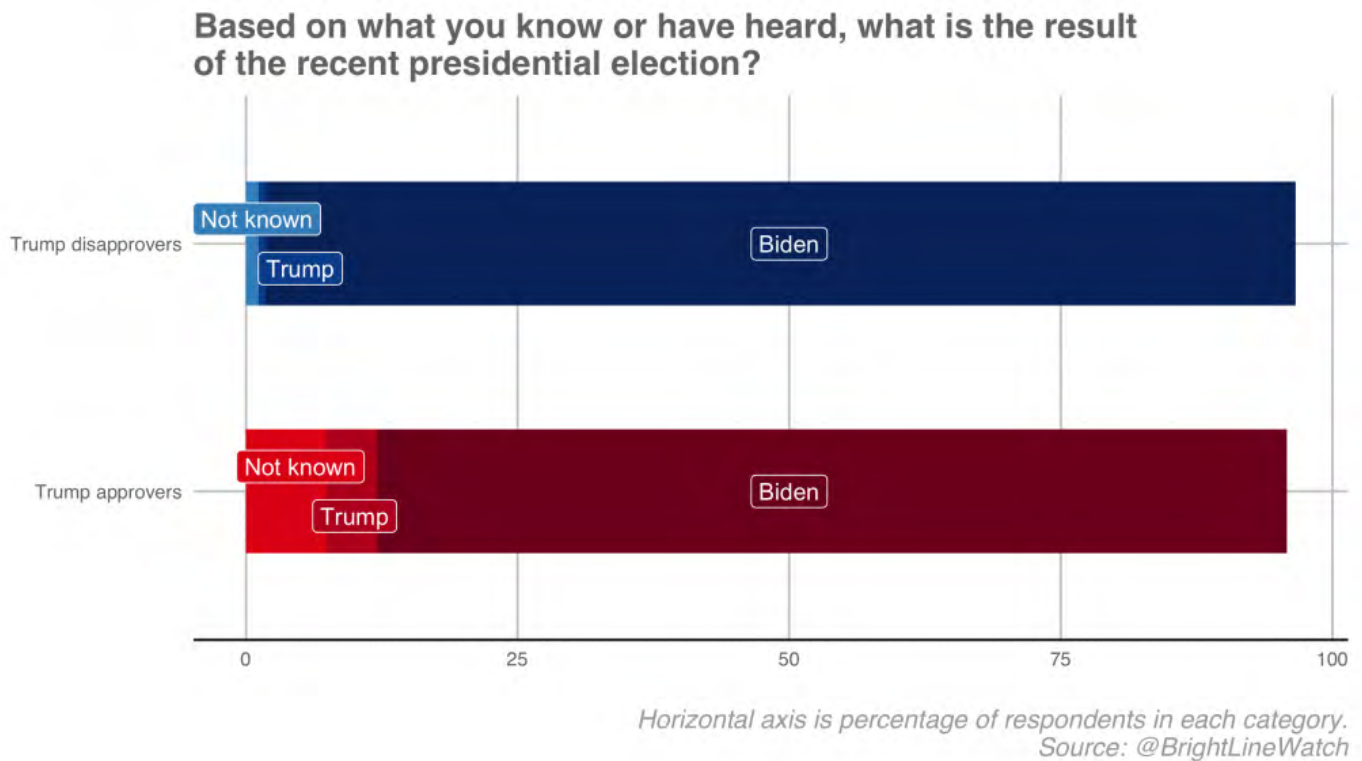


Figure 7

Based on what you know or have heard, who do you expect to be inaugurated as President on January 20, 2021?

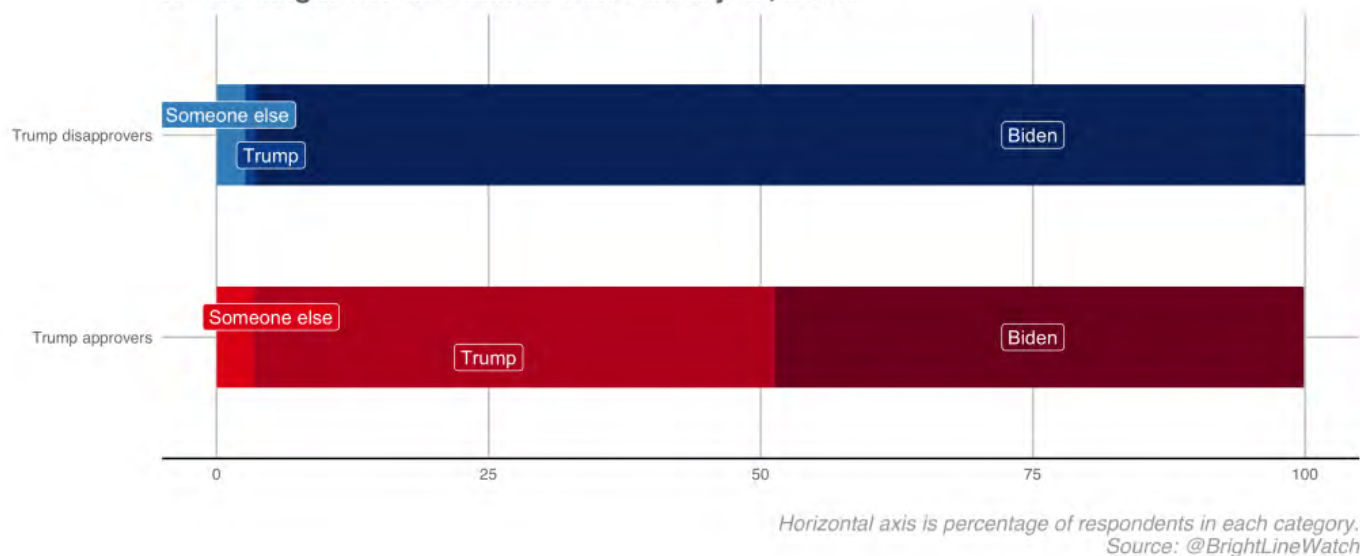


Figure 8

Percent who agree the loser must concede defeat

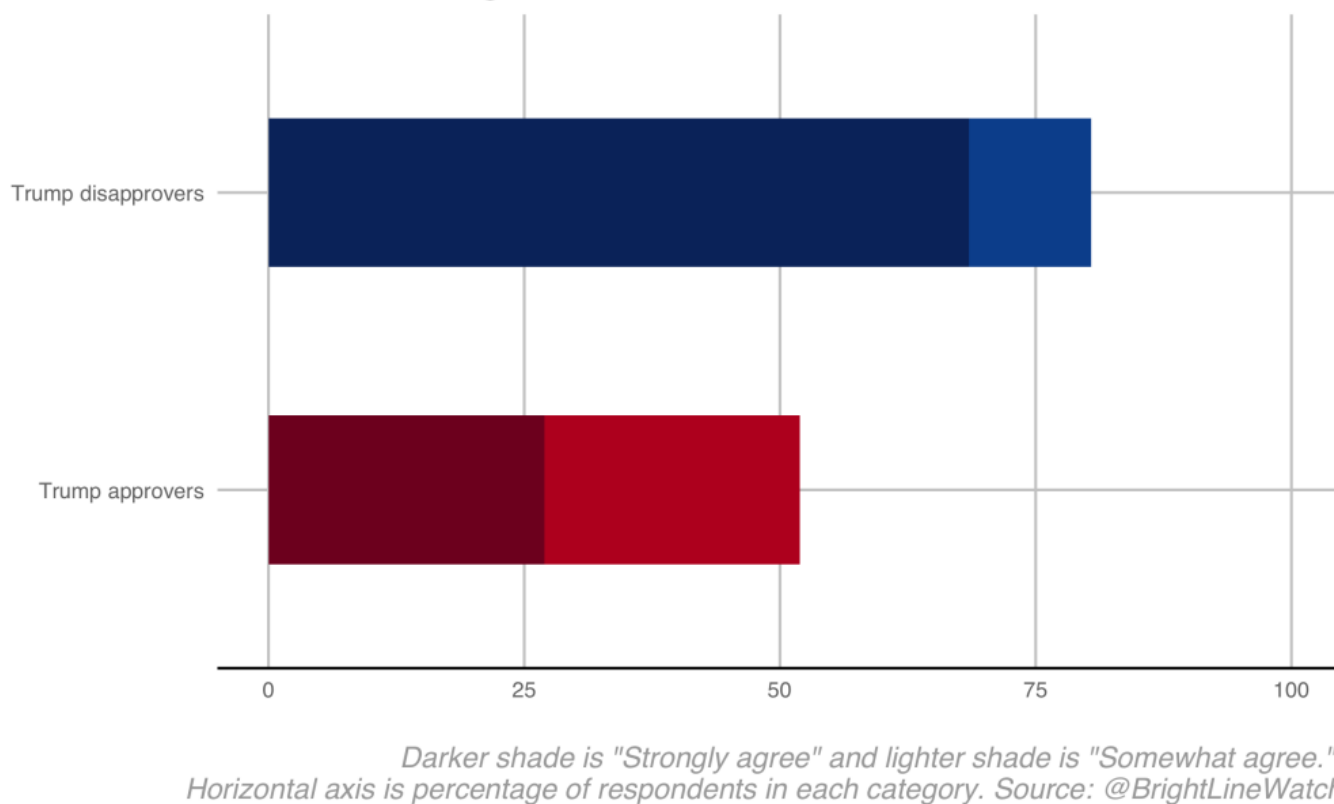
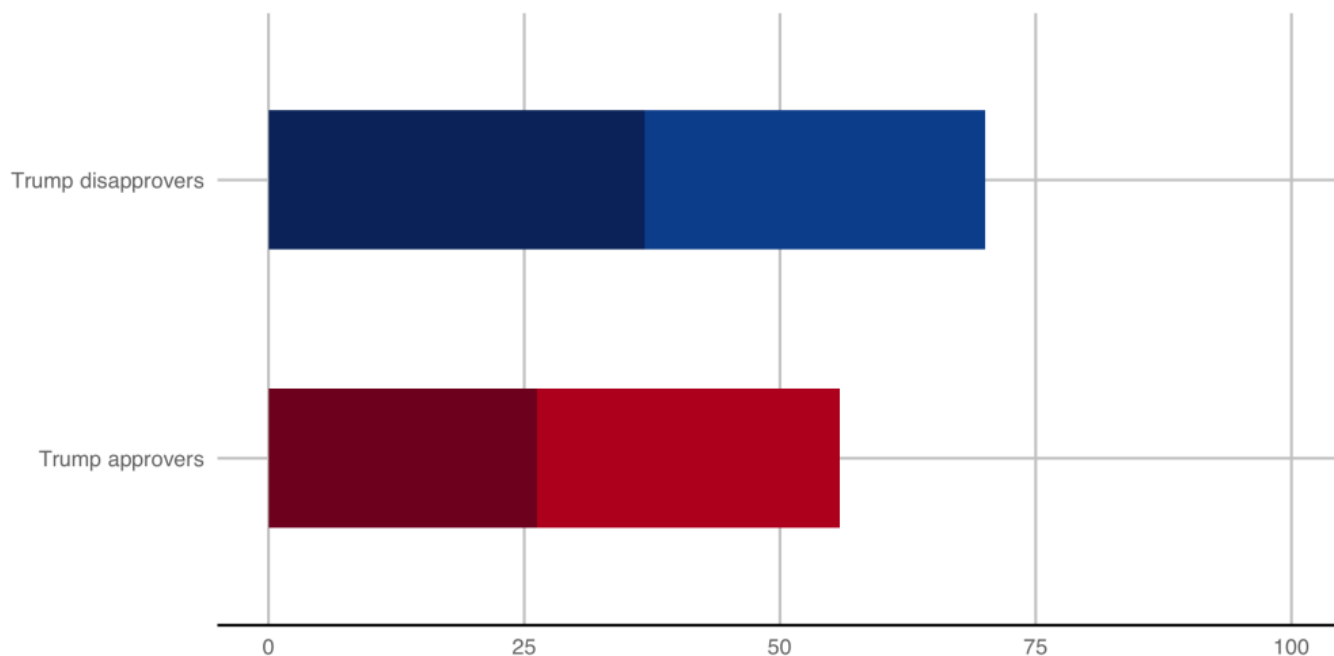


Figure 9

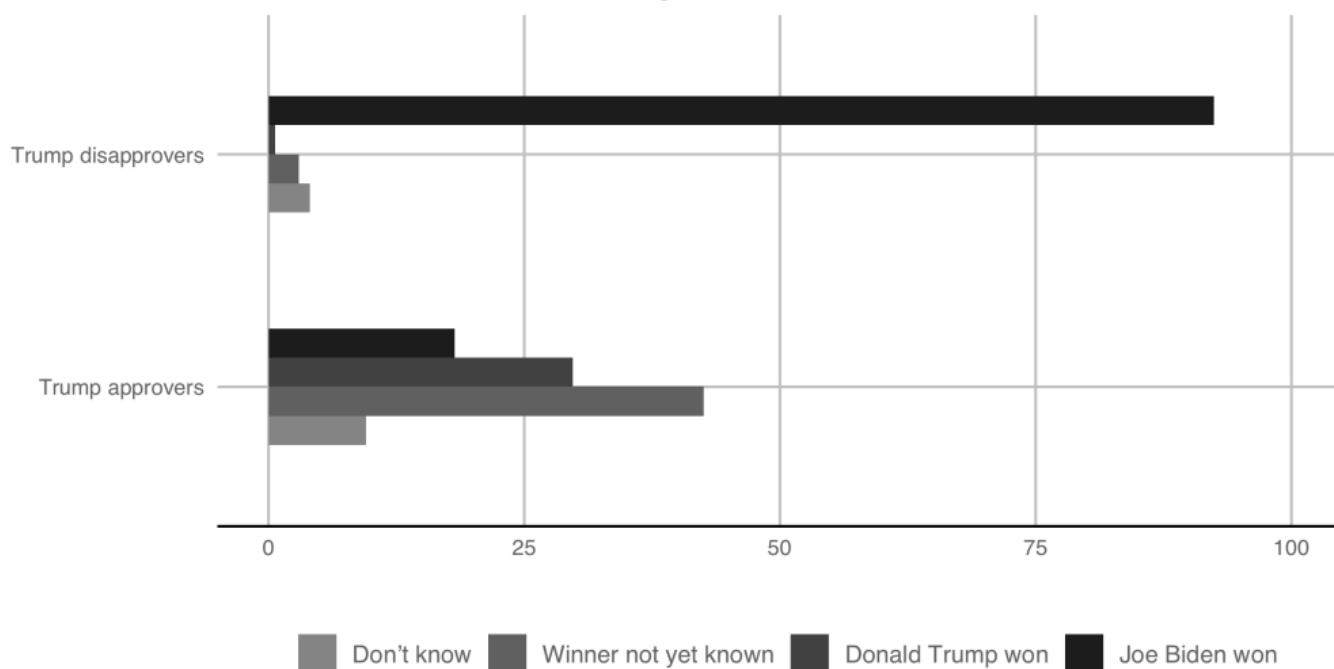
Percent who agree the winner will be able to take office peacefully Jan. 20



*Darker shade is "Strongly agree" and lighter shade is "Somewhat agree."
Horizontal axis is percentage of respondents in each category. Source: @BrightLineWatch*

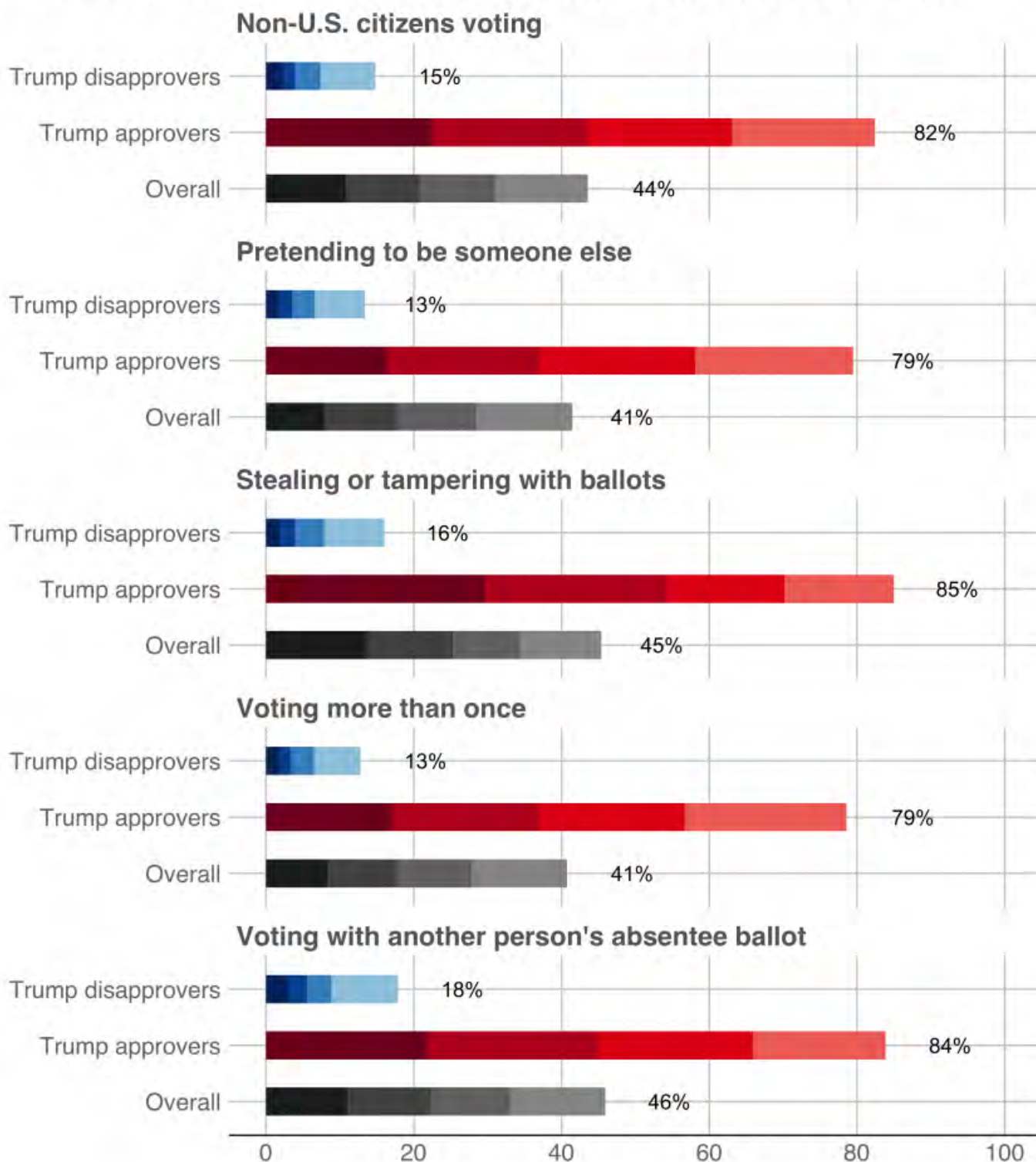
Figure 10

Based on what you know or have heard, what is the true result of the recent presidential election?



*Horizontal axis is percentage of respondents in each category. Data collected Nov. 12-25, 2020
Source: @BrightLineWatch*

Figure 11

Americans who think thousands of illegal votes are cast each election by _____

From darkest to lightest shade: A million or more, Hundreds of thousands, Tens of thousands, Thousands.
 Source: @BrightLineWatch

Figure 12

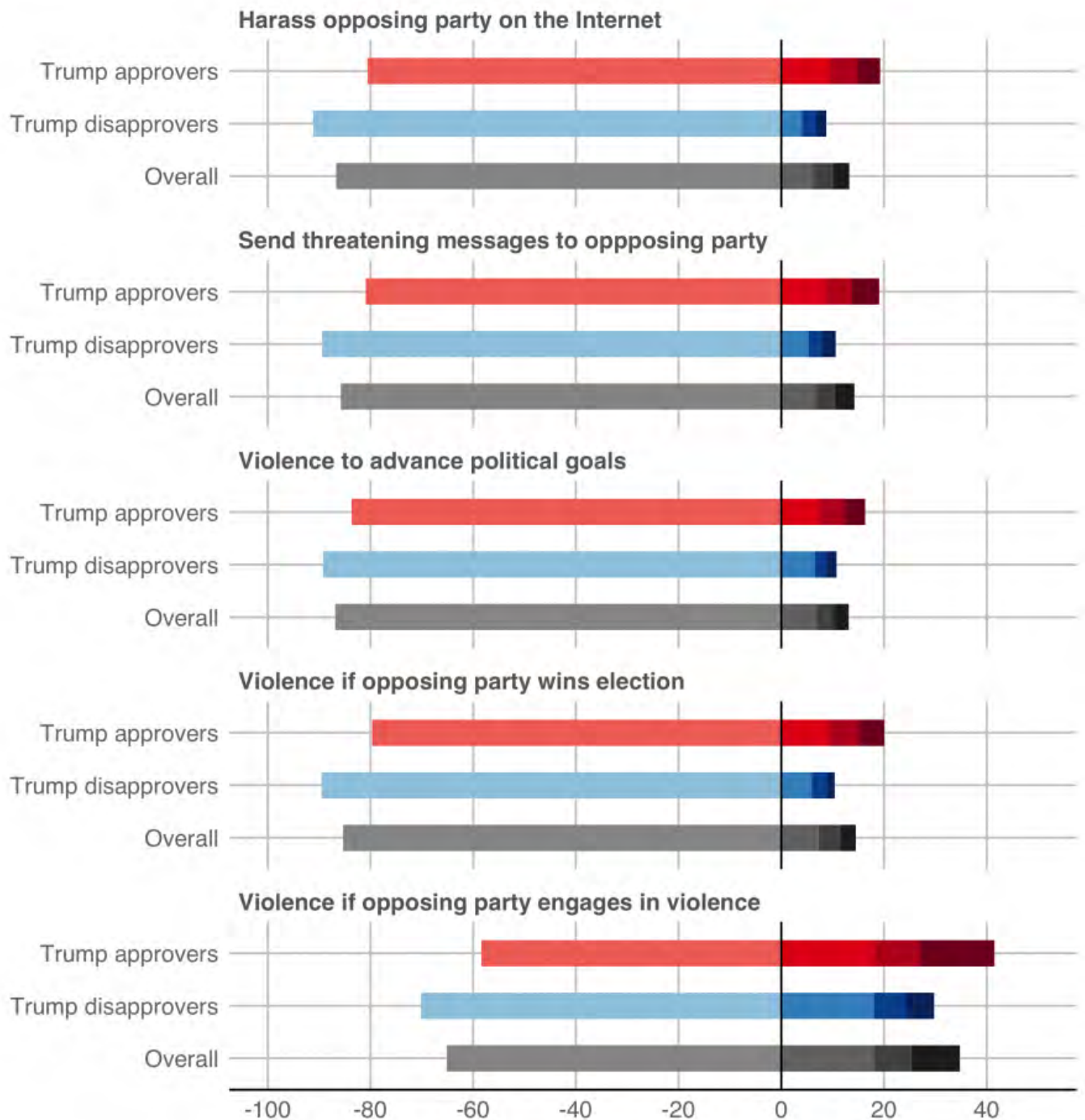


Figure 13

Exhibit 72

The Economist/YouGov Poll
November 8 - 10, 2020 - 1500 U.S. Registered Voters



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1. Direction of Country

Would you say things in this country today are...

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Generally headed in the right direction	22%	23%	21%	22%	19%	15%	24%	29%	21%
Off on the wrong track	64%	65%	64%	64%	70%	71%	58%	61%	57%
Not sure	14%	13%	15%	13%	11%	13%	17%	9%	23%
Totals	100%	101%	100%	99%	100%	99%	99%	99%	101%
Unweighted N	(1,500)	(683)	(817)	(324)	(209)	(384)	(235)	(150)	(111)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Generally headed in the right direction	22%	27%	23%	19%	23%	23%	22%	23%	23%	23%	21%	22%
Off on the wrong track	64%	59%	63%	68%	63%	63%	65%	64%	64%	66%	65%	62%
Not sure	14%	14%	14%	13%	14%	14%	13%	13%	13%	10%	14%	17%
Totals	100%	100%	100%	100%	100%	100%	100%	100%	100%	99%	100%	101%
Unweighted N	(1,500)	(191)	(307)	(613)	(389)	(522)	(439)	(373)	(244)	(373)	(498)	(385)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Generally headed in the right direction	22%	22%	25%	22%	17%	25%	20%	21%	24%
Off on the wrong track	64%	68%	61%	66%	67%	60%	69%	65%	61%
Not sure	14%	10%	14%	12%	16%	14%	11%	14%	15%
Totals	100%	100%	100%	100%	100%	99%	100%	100%	100%
Unweighted N	(1,500)	(802)	(599)	(607)	(427)	(466)	(484)	(489)	(484)

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2. Direction of News Stories about the Economy

Have you heard mostly positive or mostly negative news stories about the economy, or have you not heard much news at all about the economy?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Mostly positive	17%	20%	16%	26%	15%	15%	18%	8%	17%
Equally positive and negative	32%	33%	31%	34%	34%	32%	30%	32%	36%
Mostly negative	40%	39%	41%	30%	46%	36%	44%	49%	37%
Not heard much news about the economy at all	11%	8%	12%	9%	5%	16%	8%	11%	10%
Totals	100%	100%	100%	99%	100%	99%	100%	100%	100%
Unweighted N	(1,500)	(683)	(817)	(324)	(209)	(384)	(235)	(150)	(111)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Mostly positive	17%	13%	17%	17%	22%	15%	19%	16%	15%	18%	18%	17%
Equally positive and negative	32%	36%	30%	30%	34%	33%	36%	32%	33%	31%	31%	33%
Mostly negative	40%	36%	41%	44%	36%	39%	37%	47%	41%	40%	40%	39%
Not heard much news about the economy at all	11%	16%	12%	9%	9%	13%	9%	5%	11%	10%	11%	11%
Totals	100%	101%	100%	100%	101%	100%	101%	100%	100%	99%	100%	100%
Unweighted N	(1,500)	(191)	(307)	(613)	(389)	(522)	(439)	(373)	(244)	(373)	(498)	(385)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Mostly positive	17%	4%	35%	5%	16%	32%	4%	13%	33%
Equally positive and negative	32%	31%	29%	34%	35%	28%	33%	35%	30%
Mostly negative	40%	58%	26%	53%	36%	29%	57%	39%	28%
Not heard much news about the economy at all	11%	8%	10%	8%	13%	11%	6%	13%	10%
Totals	100%	101%	100%	100%	100%	100%	100%	100%	101%
Unweighted N	(1,500)	(802)	(599)	(607)	(427)	(466)	(484)	(489)	(484)

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3. National Unemployment Problem

How serious a problem is unemployment in the U.S.?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Very serious	42%	39%	45%	30%	45%	40%	38%	62%	48%
Somewhat serious	38%	39%	37%	43%	36%	41%	39%	24%	43%
A minor problem	14%	17%	12%	20%	14%	14%	15%	9%	5%
Not a problem	2%	4%	1%	5%	3%	2%	1%	2%	0%
Not sure	3%	2%	4%	2%	1%	4%	6%	2%	4%
Totals	99%	101%	99%	100%	99%	101%	99%	99%	100%
Unweighted N	(1,500)	(683)	(817)	(324)	(209)	(384)	(235)	(150)	(111)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Very serious	42%	35%	46%	43%	42%	48%	39%	39%	43%	40%	42%	45%
Somewhat serious	38%	43%	33%	35%	43%	35%	38%	43%	42%	40%	34%	38%
A minor problem	14%	15%	12%	18%	11%	12%	17%	14%	11%	17%	15%	13%
Not a problem	2%	2%	3%	2%	2%	1%	3%	3%	1%	1%	4%	1%
Not sure	3%	6%	5%	2%	1%	3%	3%	1%	2%	1%	5%	2%
Totals	99%	101%	99%	100%	99%	99%	100%	100%	99%	99%	100%	99%
Unweighted N	(1,500)	(191)	(307)	(613)	(389)	(522)	(439)	(373)	(244)	(373)	(498)	(385)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Very serious	42%	68%	19%	65%	37%	21%	64%	46%	22%
Somewhat serious	38%	29%	45%	29%	42%	45%	31%	39%	43%
A minor problem	14%	2%	28%	4%	15%	26%	2%	12%	26%
Not a problem	2%	1%	5%	1%	2%	4%	1%	1%	5%
Not sure	3%	1%	3%	1%	4%	4%	2%	2%	4%
Totals	99%	101%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,500)	(802)	(599)	(607)	(427)	(466)	(484)	(489)	(484)

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4. Local Unemployment Problem

How serious a problem is unemployment in your LOCAL community?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Very serious	21%	19%	23%	16%	14%	20%	17%	38%	36%
Somewhat serious	35%	34%	36%	32%	42%	33%	36%	35%	35%
A minor problem	24%	27%	22%	30%	26%	25%	26%	17%	19%
Not a problem	9%	11%	8%	12%	11%	10%	7%	4%	3%
Not sure	10%	9%	11%	11%	8%	11%	14%	6%	6%
Totals	99%	100%	100%	101%	101%	99%	100%	100%	99%
Unweighted N	(1,499)	(683)	(816)	(324)	(209)	(383)	(235)	(150)	(111)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Very serious	21%	21%	31%	20%	17%	29%	19%	17%	21%	15%	24%	25%
Somewhat serious	35%	38%	31%	34%	39%	35%	34%	40%	35%	37%	34%	36%
A minor problem	24%	22%	14%	28%	27%	22%	26%	29%	26%	29%	20%	25%
Not a problem	9%	5%	13%	10%	7%	6%	10%	10%	7%	9%	12%	6%
Not sure	10%	15%	11%	8%	9%	8%	11%	4%	10%	11%	11%	8%
Totals	99%	101%	100%	100%	99%	100%	100%	100%	99%	101%	101%	100%
Unweighted N	(1,499)	(190)	(307)	(613)	(389)	(521)	(439)	(373)	(244)	(372)	(498)	(385)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Very serious	21%	32%	11%	29%	22%	12%	25%	29%	11%
Somewhat serious	35%	45%	24%	47%	32%	25%	51%	34%	25%
A minor problem	24%	14%	37%	14%	26%	33%	12%	24%	33%
Not a problem	9%	2%	19%	2%	9%	18%	3%	5%	19%
Not sure	10%	8%	10%	8%	11%	12%	9%	7%	12%
Totals	99%	101%	101%	100%	100%	100%	100%	99%	100%
Unweighted N	(1,499)	(801)	(599)	(607)	(426)	(466)	(484)	(488)	(484)

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5. Best Economic Indicator

For you personally, which of the following do you consider the best measure of how the national economy is doing?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
The stock market index	7%	8%	6%	8%	7%	4%	9%	5%	8%
The unemployment rate and job reports	46%	47%	45%	42%	56%	39%	54%	40%	45%
The prices of goods and services you buy	26%	24%	27%	25%	24%	32%	19%	26%	23%
Your personal finances	14%	16%	12%	19%	11%	13%	9%	20%	16%
Don't know	7%	5%	10%	6%	2%	11%	9%	10%	7%
Totals	100%	100%	100%	100%	100%	99%	100%	101%	99%
Unweighted N	(1,496)	(681)	(815)	(323)	(209)	(383)	(234)	(150)	(111)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
The stock market index	7%	6%	8%	7%	7%	7%	8%	8%	5%	8%	7%	7%
The unemployment rate and job reports	46%	46%	43%	46%	48%	38%	45%	57%	48%	49%	44%	44%
The prices of goods and services you buy	26%	29%	21%	25%	28%	30%	26%	21%	25%	23%	26%	28%
Your personal finances	14%	10%	16%	16%	12%	16%	15%	12%	15%	11%	15%	14%
Don't know	7%	9%	12%	6%	5%	9%	6%	3%	8%	8%	7%	6%
Totals	100%	100%	100%	100%	100%	100%	100%	101%	101%	99%	99%	99%
Unweighted N	(1,496)	(191)	(306)	(613)	(386)	(520)	(439)	(371)	(242)	(373)	(498)	(383)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
The stock market index	7%	4%	10%	6%	5%	10%	5%	7%	9%
The unemployment rate and job reports	46%	51%	44%	48%	46%	43%	56%	43%	43%
The prices of goods and services you buy	26%	25%	25%	26%	29%	23%	23%	27%	27%
Your personal finances	14%	14%	14%	16%	9%	16%	12%	16%	14%
Don't know	7%	5%	7%	5%	11%	8%	4%	7%	7%
Totals	100%	99%	100%	101%	100%	100%	100%	100%	100%
Unweighted N	(1,496)	(800)	(598)	(606)	(425)	(465)	(483)	(488)	(482)

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6. Current Unemployment Rate

What is the current unemployment rate in the U.S.? Please tell us the percentage of adults who want to work that are currently unemployed and looking for a job. If you don't know, please make your best guess.

		Gender		White Men		White Women		Race	
	Total	Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Less than 4%	2%	2%	2%	3%	3%	2%	3%	0%	1%
Between 4% and 5%	3%	4%	3%	5%	4%	3%	4%	1%	5%
Between 5% and 6%	4%	4%	4%	4%	5%	4%	5%	4%	0%
Between 6% and 7%	17%	20%	14%	15%	28%	13%	16%	10%	16%
Between 7% and 8%	14%	19%	10%	22%	20%	8%	14%	9%	12%
Between 8% and 10%	15%	18%	13%	18%	16%	12%	15%	11%	16%
Between 10% and 12%	11%	10%	11%	13%	10%	13%	10%	10%	11%
Between 12% and 15%	7%	5%	9%	4%	5%	6%	8%	13%	9%
Greater than 15%	11%	7%	14%	5%	6%	16%	6%	21%	11%
Not sure	15%	10%	20%	11%	4%	24%	18%	20%	19%
Totals	99%	99%	100%	100%	101%	101%	99%	99%	100%
Unweighted N	(1,499)	(683)	(816)	(324)	(209)	(384)	(234)	(150)	(111)

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	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Less than 4%	2%	3%	5%	2%	1%	3%	2%	1%	3%	2%	3%	1%
Between 4% and 5%	3%	2%	5%	1%	5%	4%	3%	4%	2%	3%	4%	4%
Between 5% and 6%	4%	4%	4%	4%	3%	3%	6%	2%	3%	5%	4%	3%
Between 6% and 7%	17%	17%	11%	19%	19%	11%	17%	25%	14%	17%	18%	17%
Between 7% and 8%	14%	17%	12%	14%	15%	8%	16%	20%	20%	15%	12%	13%
Between 8% and 10%	15%	15%	14%	16%	15%	14%	19%	15%	17%	15%	14%	16%
Between 10% and 12%	11%	11%	8%	12%	11%	14%	8%	13%	7%	11%	10%	15%
Between 12% and 15%	7%	5%	10%	6%	7%	7%	8%	8%	8%	7%	6%	8%
Greater than 15%	11%	11%	11%	11%	10%	18%	7%	5%	6%	11%	13%	9%
Not sure	15%	15%	21%	14%	13%	19%	15%	6%	20%	14%	16%	13%
Totals	99%	100%	101%	99%	99%	101%	101%	99%	100%	100%	100%	99%
Unweighted N	(1,499)	(191)	(307)	(612)	(389)	(522)	(439)	(372)	(244)	(372)	(498)	(385)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Less than 4%	2%	1%	5%	1%	3%	4%	1%	2%	4%
Between 4% and 5%	3%	2%	5%	2%	4%	4%	2%	3%	5%
Between 5% and 6%	4%	2%	6%	3%	2%	7%	2%	2%	7%
Between 6% and 7%	17%	15%	22%	14%	19%	18%	18%	14%	20%
Between 7% and 8%	14%	13%	16%	13%	14%	16%	13%	16%	15%
Between 8% and 10%	15%	19%	13%	17%	17%	12%	20%	16%	11%
Between 10% and 12%	11%	11%	9%	12%	12%	9%	10%	12%	10%
Between 12% and 15%	7%	11%	4%	11%	5%	5%	10%	6%	5%
Greater than 15%	11%	13%	6%	14%	8%	9%	12%	11%	9%
Not sure	15%	14%	14%	14%	17%	16%	11%	18%	14%
Totals	99%	101%	100%	101%	101%	100%	99%	100%	100%
Unweighted N	(1,499)	(802)	(598)	(607)	(427)	(465)	(484)	(488)	(484)

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7. Knowledge of Direction of Previous Months Unemployment Rate

Since last month, has the unemployment rate increased, decreased, or stayed the same?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Increased	21%	18%	23%	20%	10%	19%	16%	38%	26%
Stayed the same	24%	21%	26%	18%	18%	29%	20%	26%	36%
Decreased	42%	52%	35%	49%	68%	32%	47%	24%	29%
Don't know	13%	9%	17%	13%	4%	20%	17%	13%	10%
Totals	100%	100%	101%	100%	100%	100%	100%	101%	101%
Unweighted N	(1,500)	(683)	(817)	(324)	(209)	(384)	(235)	(150)	(111)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Increased	21%	24%	25%	17%	20%	29%	18%	14%	19%	18%	21%	23%
Stayed the same	24%	31%	26%	21%	22%	28%	27%	18%	27%	20%	22%	27%
Decreased	42%	26%	33%	49%	49%	28%	45%	57%	38%	47%	43%	40%
Don't know	13%	19%	16%	13%	8%	14%	10%	11%	16%	14%	13%	10%
Totals	100%	100%	100%	100%	99%	99%	100%	100%	100%	99%	99%	100%
Unweighted N	(1,500)	(191)	(307)	(613)	(389)	(522)	(439)	(373)	(244)	(373)	(498)	(385)

The Economist/YouGov Poll
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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Increased	21%	28%	12%	29%	19%	13%	25%	23%	14%
Stayed the same	24%	25%	18%	27%	22%	21%	28%	24%	20%
Decreased	42%	34%	58%	32%	44%	53%	34%	40%	55%
Don't know	13%	13%	12%	12%	15%	13%	13%	13%	11%
Totals	100%	100%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,500)	(802)	(599)	(607)	(427)	(466)	(484)	(489)	(484)

The Economist/YouGov Poll
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8. Good Job Indicator

How good of a job do you think the national unemployment rate explains the actual health of the national economy?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Very good	8%	8%	7%	10%	6%	6%	8%	11%	8%
Good	30%	32%	28%	34%	36%	27%	34%	22%	21%
Fair	33%	36%	31%	28%	43%	30%	34%	30%	30%
Poor	12%	12%	12%	12%	9%	14%	9%	12%	15%
Very poor	6%	5%	7%	4%	4%	4%	5%	10%	15%
Don't know	11%	7%	14%	11%	1%	18%	10%	15%	11%
Totals	100%	100%	99%	99%	99%	99%	100%	100%	100%
Unweighted N	(1,499)	(683)	(816)	(324)	(209)	(384)	(235)	(150)	(110)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Very good	8%	6%	8%	9%	7%	6%	7%	10%	5%	8%	10%	7%
Good	30%	24%	25%	31%	35%	25%	34%	31%	25%	34%	32%	26%
Fair	33%	35%	33%	34%	31%	33%	32%	39%	33%	32%	30%	38%
Poor	12%	16%	7%	12%	14%	13%	13%	12%	17%	13%	9%	13%
Very poor	6%	3%	10%	6%	5%	8%	6%	3%	7%	4%	7%	7%
Don't know	11%	16%	16%	8%	9%	14%	8%	4%	12%	10%	12%	10%
Totals	100%	100%	99%	100%	101%	99%	100%	99%	99%	101%	100%	101%
Unweighted N	(1,499)	(191)	(306)	(613)	(389)	(522)	(439)	(373)	(243)	(373)	(498)	(385)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Very good	8%	7%	10%	6%	8%	9%	8%	7%	9%
Good	30%	26%	36%	26%	26%	37%	24%	27%	39%
Fair	33%	36%	33%	33%	34%	32%	36%	35%	31%
Poor	12%	14%	9%	14%	14%	8%	16%	12%	9%
Very poor	6%	8%	3%	8%	7%	4%	9%	7%	3%
Don't know	11%	9%	9%	12%	11%	10%	7%	12%	10%
Totals	100%	100%	100%	99%	100%	100%	100%	100%	101%
Unweighted N	(1,499)	(802)	(598)	(607)	(426)	(466)	(484)	(489)	(484)

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9. Unemployment Statistics

The government releases unemployment numbers on the first Friday of the month. Do you think the government numbers are accurate or do you think there are more unemployed people or fewer unemployed people?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
More unemployed people	52%	50%	54%	44%	55%	47%	55%	66%	54%
The government numbers are accurate	25%	29%	21%	31%	32%	21%	27%	17%	23%
Fewer unemployed people	7%	6%	7%	7%	5%	9%	4%	4%	8%
Don't know	16%	14%	17%	17%	8%	23%	14%	12%	15%
Totals	100%	99%	99%	99%	100%	100%	100%	99%	100%
Unweighted N	(1,498)	(683)	(815)	(324)	(209)	(383)	(235)	(150)	(110)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
More unemployed people	52%	46%	54%	54%	52%	57%	51%	49%	51%	53%	52%	54%
The government numbers are accurate	25%	23%	24%	25%	28%	20%	26%	33%	24%	24%	24%	29%
Fewer unemployed people	7%	9%	7%	5%	7%	7%	6%	6%	8%	5%	8%	6%
Don't know	16%	22%	16%	16%	13%	16%	18%	12%	17%	19%	17%	11%
Totals	100%	100%	101%	100%	100%	100%	101%	100%	100%	101%	101%	100%
Unweighted N	(1,498)	(190)	(307)	(612)	(389)	(522)	(437)	(373)	(243)	(373)	(498)	(384)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
More unemployed people	52%	72%	31%	69%	53%	33%	70%	58%	35%
The government numbers are accurate	25%	16%	38%	16%	21%	39%	18%	20%	37%
Fewer unemployed people	7%	2%	13%	3%	4%	12%	2%	5%	11%
Don't know	16%	10%	18%	11%	22%	16%	10%	17%	17%
Totals	100%	100%	100%	99%	100%	100%	100%	100%	100%
Unweighted N	(1,498)	(801)	(598)	(607)	(426)	(465)	(484)	(488)	(483)

The Economist/YouGov Poll
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10. Improving Economy

Do you think improving the economy is...

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Something the president can do a lot about	55%	48%	62%	48%	45%	62%	58%	62%	57%
Something the president can do a little about	35%	42%	28%	42%	48%	26%	35%	22%	33%
Something that is that mostly beyond the president's control	10%	10%	10%	10%	7%	11%	7%	16%	9%
Totals	100%	100%	100%	100%	100%	99%	100%	100%	99%
Unweighted N	(1,495)	(680)	(815)	(323)	(208)	(384)	(235)	(148)	(111)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Something the president can do a lot about	55%	44%	48%	60%	61%	57%	53%	54%	57%	57%	56%	51%
Something the president can do a little about	35%	43%	40%	31%	30%	30%	38%	38%	35%	34%	33%	38%
Something that is that mostly beyond the president's control	10%	12%	12%	8%	9%	13%	9%	8%	9%	9%	10%	10%
Totals	100%	99%	100%	99%	100%	100%	100%	100%	101%	100%	99%	99%
Unweighted N	(1,495)	(190)	(305)	(612)	(388)	(519)	(437)	(373)	(243)	(372)	(496)	(384)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Something the president can do a lot about	55%	56%	59%	57%	56%	54%	54%	54%	58%
Something the president can do a little about	35%	34%	32%	33%	36%	35%	39%	35%	32%
Something that is that mostly beyond the president's control	10%	10%	9%	10%	8%	12%	8%	11%	10%
Totals	100%	100%	100%	100%	100%	101%	101%	100%	100%
Unweighted N	(1,495)	(801)	(596)	(606)	(425)	(464)	(482)	(486)	(484)

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11. Optimistic about Future

Are you optimistic or pessimistic about the future of the country?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Optimistic	46%	42%	50%	33%	40%	41%	52%	67%	55%
Pessimistic	36%	44%	29%	46%	50%	35%	30%	19%	31%
Not sure	18%	14%	21%	21%	10%	25%	18%	14%	14%
Totals	100%	100%	100%	100%	100%	101%	100%	100%	100%
Unweighted N	(1,500)	(683)	(817)	(324)	(209)	(384)	(235)	(150)	(111)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Optimistic	46%	49%	47%	47%	42%	46%	44%	52%	50%	42%	43%	53%
Pessimistic	36%	35%	35%	35%	39%	31%	40%	36%	35%	39%	39%	29%
Not sure	18%	16%	19%	17%	18%	23%	16%	12%	15%	19%	18%	18%
Totals	100%	100%	101%	99%	99%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,500)	(191)	(307)	(613)	(389)	(522)	(439)	(373)	(244)	(373)	(498)	(385)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Optimistic	46%	73%	21%	72%	38%	23%	76%	48%	22%
Pessimistic	36%	14%	61%	15%	40%	57%	13%	35%	56%
Not sure	18%	13%	18%	12%	22%	20%	11%	16%	22%
Totals	100%	100%	100%	99%	100%	100%	100%	99%	100%
Unweighted N	(1,500)	(802)	(599)	(607)	(427)	(466)	(484)	(489)	(484)

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12. You Better Off Now

Are you better off now than you were four years ago?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Better off now	48%	54%	43%	62%	58%	46%	47%	27%	34%
Better off four years ago	34%	31%	37%	22%	25%	38%	28%	57%	46%
Not sure	17%	15%	20%	15%	17%	16%	24%	16%	20%
Totals	99%	100%	100%	99%	100%	100%	99%	100%	100%
Unweighted N	(1,499)	(682)	(817)	(324)	(209)	(384)	(235)	(149)	(111)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Better off now	48%	46%	46%	50%	50%	42%	49%	57%	38%	49%	52%	50%
Better off four years ago	34%	34%	31%	37%	33%	42%	32%	30%	43%	31%	31%	35%
Not sure	17%	21%	23%	13%	17%	16%	20%	13%	19%	20%	17%	15%
Totals	99%	101%	100%	100%	100%	100%	101%	100%	100%	100%	100%	100%
Unweighted N	(1,499)	(191)	(306)	(613)	(389)	(522)	(438)	(373)	(243)	(373)	(498)	(385)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Better off now	48%	28%	73%	31%	47%	69%	28%	43%	70%
Better off four years ago	34%	51%	14%	50%	35%	16%	51%	41%	15%
Not sure	17%	21%	13%	19%	19%	15%	21%	16%	15%
Totals	99%	100%	100%	100%	101%	100%	100%	100%	100%
Unweighted N	(1,499)	(802)	(598)	(607)	(427)	(465)	(484)	(489)	(483)

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13. Country Better Off Now

Is the country better off now than it was four years ago?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Better off now	38%	42%	35%	47%	44%	42%	34%	17%	37%
Better off four years ago	48%	46%	50%	39%	49%	41%	53%	71%	46%
Not sure	14%	12%	15%	13%	7%	18%	13%	12%	17%
Totals	100%	100%	100%	99%	100%	101%	100%	100%	100%
Unweighted N	(1,488)	(679)	(809)	(324)	(207)	(378)	(233)	(150)	(110)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Better off now	38%	34%	36%	38%	43%	35%	38%	41%	29%	39%	45%	34%
Better off four years ago	48%	45%	46%	53%	45%	50%	45%	53%	58%	45%	42%	53%
Not sure	14%	21%	18%	9%	12%	16%	18%	6%	14%	16%	12%	13%
Totals	100%	100%	100%	100%	100%	101%	101%	100%	101%	100%	99%	100%
Unweighted N	(1,488)	(189)	(306)	(607)	(386)	(517)	(435)	(371)	(241)	(371)	(493)	(383)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Better off now	38%	8%	74%	12%	36%	71%	11%	28%	71%
Better off four years ago	48%	80%	15%	75%	47%	18%	78%	54%	18%
Not sure	14%	12%	10%	13%	17%	11%	11%	18%	11%
Totals	100%	100%	99%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,488)	(796)	(594)	(603)	(423)	(462)	(480)	(486)	(481)

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14. Attention to 2020 Election

How much attention have you been paying to the 2020 election campaign for president?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
A lot	71%	75%	68%	70%	89%	67%	80%	56%	61%
Some	20%	17%	22%	24%	9%	22%	12%	35%	18%
Only a little	6%	6%	7%	2%	2%	9%	3%	7%	17%
None at all	2%	2%	3%	3%	0%	1%	4%	2%	4%
Totals	99%	100%	100%	99%	100%	99%	99%	100%	100%
Unweighted N	(1,497)	(681)	(816)	(323)	(208)	(383)	(235)	(150)	(111)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
A lot	71%	53%	57%	79%	83%	57%	75%	84%	72%	75%	71%	67%
Some	20%	34%	27%	16%	12%	32%	17%	11%	19%	17%	21%	22%
Only a little	6%	12%	8%	5%	4%	9%	5%	4%	4%	7%	6%	9%
None at all	2%	1%	8%	1%	1%	2%	3%	1%	5%	1%	2%	3%
Totals	99%	100%	100%	101%	100%	100%	100%	100%	100%	100%	100%	101%
Unweighted N	(1,497)	(191)	(307)	(611)	(388)	(522)	(437)	(373)	(242)	(372)	(498)	(385)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
A lot	71%	82%	77%	74%	66%	73%	83%	63%	74%
Some	20%	14%	16%	19%	23%	19%	12%	26%	18%
Only a little	6%	4%	4%	6%	8%	6%	4%	8%	6%
None at all	2%	0%	2%	1%	3%	3%	1%	3%	2%
Totals	99%	100%	99%	100%	100%	101%	100%	100%	100%
Unweighted N	(1,497)	(801)	(597)	(606)	(426)	(465)	(484)	(488)	(482)

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15. Vote in 2020 Primary or Caucus

Did you vote in the Democratic or Republican Presidential primary or caucus in your state in 2020?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Democratic primary/caucus	44%	41%	47%	24%	43%	34%	48%	77%	61%
Republican primary/caucus	34%	34%	34%	41%	39%	47%	33%	10%	20%
Neither one	20%	24%	16%	34%	17%	18%	14%	10%	19%
Not sure	2%	1%	2%	1%	1%	1%	5%	3%	1%
Totals	100%	100%	99%	100%	100%	100%	100%	100%	101%
Unweighted N	(1,496)	(682)	(814)	(324)	(209)	(384)	(233)	(150)	(109)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Democratic primary/caucus	44%	46%	45%	46%	39%	44%	45%	46%	49%	42%	40%	51%
Republican primary/caucus	34%	27%	27%	33%	45%	32%	34%	35%	26%	40%	36%	31%
Neither one	20%	25%	23%	19%	16%	23%	18%	19%	23%	18%	22%	17%
Not sure	2%	1%	4%	2%	0%	1%	2%	1%	2%	1%	2%	1%
Totals	100%	99%	99%	100%	100%	100%	99%	101%	100%	101%	100%	100%
Unweighted N	(1,496)	(191)	(306)	(611)	(388)	(522)	(438)	(371)	(244)	(372)	(497)	(383)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Democratic primary/caucus	44%	86%	5%	88%	33%	4%	87%	47%	8%
Republican primary/caucus	34%	3%	77%	2%	23%	80%	3%	24%	68%
Neither one	20%	10%	16%	10%	40%	15%	9%	28%	22%
Not sure	2%	1%	1%	0%	4%	1%	0%	1%	2%
Totals	100%	100%	99%	100%	100%	100%	99%	100%	100%
Unweighted N	(1,496)	(801)	(597)	(606)	(425)	(465)	(482)	(488)	(483)

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16. 2020 Turnout

Did you vote in the November 2020 general election?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Yes	88%	88%	88%	83%	99%	86%	97%	86%	75%
No	12%	12%	12%	17%	1%	14%	3%	14%	25%
Totals	100%	100%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,500)	(683)	(817)	(324)	(209)	(384)	(235)	(150)	(111)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Yes	88%	73%	79%	93%	98%	79%	89%	98%	92%	92%	84%	88%
No	12%	27%	21%	7%	2%	21%	11%	2%	8%	8%	16%	12%
Totals	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,500)	(191)	(307)	(613)	(389)	(522)	(439)	(373)	(244)	(373)	(498)	(385)

	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Yes	88%	100%	100%	91%	80%	92%	95%	82%	91%
No	12%	0%	0%	9%	20%	8%	5%	18%	9%
Totals	100%	100%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,500)	(802)	(599)	(607)	(427)	(466)	(484)	(489)	(484)

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17. Vote Method

How did you vote in the presidential election this year?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
In person on election day	23%	25%	22%	27%	25%	25%	23%	14%	21%
In person before the election	28%	28%	27%	25%	33%	24%	33%	28%	21%
By mail	37%	35%	39%	31%	40%	37%	41%	43%	33%
I did not vote this year	12%	12%	12%	17%	1%	14%	3%	14%	25%
Totals	100%	100%	100%	100%	99%	100%	100%	99%	100%
Unweighted N	(1,499)	(683)	(816)	(324)	(209)	(384)	(234)	(150)	(111)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
In person on election day	23%	18%	25%	25%	22%	22%	24%	25%	37%	32%	19%	12%
In person before the election	28%	23%	23%	31%	30%	22%	28%	33%	20%	26%	38%	17%
By mail	37%	32%	31%	37%	46%	35%	37%	40%	36%	34%	27%	59%
I did not vote this year	12%	27%	21%	7%	2%	21%	11%	2%	8%	8%	16%	12%
Totals	100%	100%	100%	100%	100%	100%	100%	100%	101%	100%	100%	100%
Unweighted N	(1,499)	(191)	(307)	(613)	(388)	(522)	(439)	(373)	(244)	(373)	(498)	(384)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
In person on election day	23%	16%	38%	15%	25%	32%	16%	22%	30%
In person before the election	28%	29%	34%	28%	23%	31%	29%	24%	31%
By mail	37%	54%	27%	49%	32%	28%	50%	35%	29%
I did not vote this year	12%	0%	0%	9%	20%	8%	5%	19%	9%
Totals	100%	99%	99%	101%	100%	99%	100%	100%	99%
Unweighted N	(1,499)	(802)	(598)	(607)	(426)	(466)	(484)	(488)	(484)

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18. 2020 President Vote Post Election

Who did you vote for in the election for President in 2020?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Joe Biden	45%	41%	48%	25%	47%	35%	52%	76%	48%
Donald Trump	41%	44%	38%	54%	48%	50%	42%	6%	25%
Jo Jorgensen	0%	1%	0%	1%	1%	0%	0%	1%	0%
Howie Hawkins	0%	0%	0%	0%	0%	0%	0%	0%	0%
Other	0%	0%	0%	0%	1%	0%	0%	0%	0%
Did not vote for President	14%	14%	13%	20%	3%	15%	5%	16%	27%
Totals	100%	100%	99%	100%	100%	100%	99%	99%	100%
Unweighted N	(1,500)	(683)	(817)	(324)	(209)	(384)	(235)	(150)	(111)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Joe Biden	45%	49%	41%	48%	42%	42%	47%	51%	56%	44%	39%	48%
Donald Trump	41%	24%	34%	42%	52%	34%	40%	44%	34%	45%	44%	35%
Jo Jorgensen	0%	0%	1%	0%	0%	1%	1%	0%	0%	1%	1%	0%
Howie Hawkins	0%	0%	0%	0%	0%	0%	0%	0%	1%	0%	0%	0%
Other	0%	0%	1%	0%	0%	0%	0%	0%	0%	1%	0%	0%
Did not vote for President	14%	27%	23%	9%	5%	23%	12%	5%	8%	9%	17%	17%
Totals	100%	100%	100%	99%	99%	100%	100%	100%	99%	100%	101%	100%
Unweighted N	(1,500)	(191)	(307)	(613)	(389)	(522)	(439)	(373)	(244)	(373)	(498)	(385)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Joe Biden	45%	100%	0%	87%	37%	4%	90%	48%	7%
Donald Trump	41%	0%	100%	3%	39%	85%	3%	31%	81%
Jo Jorgensen	0%	0%	0%	0%	1%	0%	0%	1%	0%
Howie Hawkins	0%	0%	0%	0%	0%	0%	0%	0%	0%
Other	0%	0%	0%	0%	1%	0%	0%	0%	0%
Did not vote for President	14%	0%	0%	10%	23%	10%	6%	20%	12%
Totals	100%	100%	100%	100%	101%	99%	99%	100%	100%
Unweighted N	(1,500)	(802)	(599)	(607)	(427)	(466)	(484)	(489)	(484)

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19. House Vote Post 2020

In the 2020 elections for U.S. House of Representatives, who did you vote for in the district where you live?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Democratic candidate	45%	41%	48%	25%	46%	36%	51%	76%	52%
Republican candidate	40%	45%	36%	54%	51%	46%	42%	6%	23%
Independent candidate	2%	1%	3%	1%	0%	3%	4%	0%	2%
Other candidate	0%	0%	0%	0%	1%	0%	0%	0%	0%
Did not vote for U.S. House	13%	13%	13%	20%	1%	15%	3%	18%	23%
Totals	100%	100%	100%	100%	99%	100%	100%	100%	100%
Unweighted N	(1,499)	(682)	(817)	(324)	(209)	(384)	(235)	(150)	(110)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Democratic candidate	45%	46%	42%	48%	42%	41%	48%	49%	55%	42%	39%	48%
Republican candidate	40%	25%	31%	42%	53%	33%	41%	45%	33%	47%	41%	37%
Independent candidate	2%	1%	4%	1%	1%	2%	1%	3%	2%	1%	3%	1%
Other candidate	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	0%	0%
Did not vote for U.S. House	13%	28%	23%	9%	3%	23%	11%	3%	10%	9%	17%	14%
Totals	100%	100%	100%	100%	99%	99%	101%	100%	100%	100%	100%	100%
Unweighted N	(1,499)	(191)	(307)	(613)	(388)	(522)	(438)	(373)	(244)	(373)	(498)	(384)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Democratic candidate	45%	95%	3%	88%	35%	4%	91%	47%	7%
Republican candidate	40%	3%	93%	2%	37%	86%	3%	30%	81%
Independent candidate	2%	1%	2%	0%	5%	0%	1%	4%	1%
Other candidate	0%	0%	1%	0%	1%	0%	0%	1%	0%
Did not vote for U.S. House	13%	1%	1%	10%	21%	9%	5%	19%	11%
Totals	100%	100%	100%	100%	99%	99%	100%	101%	100%
Unweighted N	(1,499)	(802)	(599)	(607)	(426)	(466)	(484)	(488)	(484)

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20. When Mind Made Up to Vote

When did you make up your mind about whether or not to vote?

Among 2020 voters

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
On Election Day	5%	3%	6%	2%	1%	8%	1%	3%	8%
A few days before the election	5%	5%	5%	6%	3%	2%	5%	7%	14%
A week before the election	3%	4%	3%	5%	0%	2%	4%	5%	6%
A month before the election	6%	5%	8%	3%	4%	6%	5%	10%	12%
In the summer	6%	8%	4%	6%	6%	5%	4%	6%	8%
I knew all along	75%	75%	74%	77%	85%	76%	82%	69%	51%
Totals	100%	100%	100%	99%	99%	99%	101%	100%	99%
Unweighted N	(1,495)	(682)	(813)	(324)	(209)	(382)	(234)	(149)	(110)

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	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
On Election Day	5%	14%	7%	2%	1%	8%	3%	2%	3%	4%	7%	2%
A few days before the election	5%	10%	11%	3%	1%	7%	7%	2%	4%	4%	4%	10%
A week before the election	3%	8%	6%	1%	2%	6%	3%	2%	4%	2%	2%	7%
A month before the election	6%	5%	7%	7%	6%	9%	4%	5%	6%	4%	8%	5%
In the summer	6%	11%	6%	5%	4%	8%	6%	5%	5%	8%	6%	4%
I knew all along	75%	53%	63%	81%	87%	63%	76%	84%	78%	78%	73%	71%
Totals	100%	101%	100%	99%	101%	101%	99%	100%	100%	100%	100%	99%
Unweighted N	(1,495)	(190)	(305)	(612)	(388)	(520)	(438)	(372)	(243)	(371)	(498)	(383)

	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
On Election Day	5%	2%	1%	3%	9%	3%	4%	7%	3%
A few days before the election	5%	2%	3%	5%	5%	6%	3%	6%	5%
A week before the election	3%	3%	2%	3%	4%	2%	2%	6%	2%
A month before the election	6%	5%	6%	7%	6%	5%	5%	8%	6%
In the summer	6%	5%	5%	5%	9%	5%	3%	11%	4%
I knew all along	75%	82%	83%	76%	67%	80%	83%	63%	80%
Totals	100%	99%	100%	99%	100%	101%	100%	101%	100%
Unweighted N	(1,495)	(800)	(597)	(605)	(426)	(464)	(482)	(488)	(482)

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21. When Mind Made Up to Choose Vote

When did you make up your mind about who to vote for?

Among 2020 voters

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
On Election Day	1%	2%	1%	1%	2%	1%	0%	1%	4%
A few days before the election	3%	3%	4%	3%	3%	1%	6%	3%	5%
A week before the election	3%	2%	3%	3%	1%	2%	5%	2%	3%
A month before the election	7%	8%	6%	8%	5%	5%	5%	11%	14%
In the summer	13%	15%	12%	12%	17%	13%	9%	13%	9%
I knew all along	73%	71%	74%	74%	73%	77%	75%	71%	67%
Totals	100%	101%	100%	101%	101%	99%	100%	101%	102%
Unweighted N	(1,437)	(658)	(779)	(313)	(205)	(366)	(231)	(140)	(98)

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	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
On Election Day	1%	4%	3%	0%	0%	2%	1%	2%	1%	1%	1%	2%
A few days before the election	3%	11%	5%	2%	1%	4%	3%	3%	3%	4%	2%	5%
A week before the election	3%	3%	4%	2%	2%	3%	2%	4%	3%	3%	1%	5%
A month before the election	7%	9%	11%	6%	5%	9%	7%	6%	5%	4%	8%	10%
In the summer	13%	17%	14%	13%	11%	14%	15%	12%	13%	14%	14%	11%
I knew all along	73%	56%	63%	77%	81%	68%	72%	74%	76%	74%	75%	66%
Totals	100%	100%	100%	100%	100%	100%	100%	101%	101%	100%	101%	99%
Unweighted N	(1,437)	(170)	(283)	(600)	(384)	(484)	(425)	(370)	(235)	(362)	(469)	(371)

	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
On Election Day	1%	2%	0%	2%	1%	0%	2%	2%	0%
A few days before the election	3%	2%	4%	2%	3%	5%	3%	4%	3%
A week before the election	3%	2%	2%	2%	6%	2%	1%	4%	3%
A month before the election	7%	6%	6%	7%	9%	5%	6%	9%	6%
In the summer	13%	15%	11%	14%	17%	9%	13%	20%	8%
I knew all along	73%	72%	77%	74%	63%	79%	75%	61%	81%
Totals	100%	99%	100%	101%	99%	100%	100%	100%	101%
Unweighted N	(1,437)	(797)	(595)	(588)	(401)	(448)	(473)	(464)	(466)

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22. Personal Vote Count

How much confidence do you have that your vote in the 2020 presidential election was counted accurately?

Among 2020 voters

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
A great deal	49%	48%	50%	39%	55%	42%	54%	66%	47%
Quite a bit	16%	18%	15%	16%	16%	12%	20%	12%	26%
A moderate amount	11%	12%	10%	17%	11%	12%	10%	10%	4%
Only a little	7%	7%	8%	8%	7%	9%	5%	6%	1%
None at all	14%	14%	15%	19%	10%	21%	9%	3%	21%
Not sure	2%	2%	3%	2%	1%	5%	3%	3%	2%
Totals	99%	101%	101%	101%	100%	101%	101%	100%	101%
Unweighted N	(1,444)	(661)	(783)	(312)	(208)	(368)	(233)	(139)	(99)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
A great deal	49%	49%	48%	53%	44%	47%	52%	50%	47%	50%	51%	46%
Quite a bit	16%	18%	16%	16%	15%	14%	16%	20%	19%	18%	15%	14%
A moderate amount	11%	12%	13%	7%	15%	13%	11%	10%	11%	9%	11%	13%
Only a little	7%	10%	9%	6%	6%	8%	7%	6%	9%	7%	6%	8%
None at all	14%	10%	12%	15%	17%	14%	12%	14%	13%	14%	14%	15%
Not sure	2%	0%	2%	3%	3%	4%	2%	1%	1%	1%	3%	3%
Totals	99%	99%	100%	100%	100%	100%	100%	101%	100%	99%	100%	99%
Unweighted N	(1,444)	(172)	(286)	(600)	(386)	(485)	(427)	(371)	(237)	(362)	(472)	(373)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
A great deal	49%	77%	20%	76%	45%	22%	78%	53%	23%
Quite a bit	16%	15%	17%	16%	14%	18%	16%	16%	16%
A moderate amount	11%	5%	16%	5%	9%	20%	3%	10%	17%
Only a little	7%	1%	14%	2%	8%	12%	1%	6%	13%
None at all	14%	0%	30%	1%	21%	25%	1%	12%	27%
Not sure	2%	1%	4%	1%	3%	4%	0%	2%	4%
Totals	99%	99%	101%	101%	100%	101%	99%	99%	100%
Unweighted N	(1,444)	(800)	(598)	(589)	(402)	(453)	(476)	(464)	(469)

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23. 2020 Fair Election

How much confidence do you have that the 2020 presidential election was held fairly?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
A great deal	40%	39%	41%	26%	43%	32%	47%	63%	42%
Quite a bit	8%	8%	9%	6%	9%	6%	10%	11%	10%
A moderate amount	11%	10%	12%	12%	7%	10%	11%	15%	17%
Only a little	10%	12%	8%	14%	15%	8%	8%	3%	11%
None at all	29%	30%	29%	41%	27%	42%	24%	5%	18%
Not sure	1%	1%	1%	1%	0%	2%	1%	3%	2%
Totals	99%	100%	100%	100%	101%	100%	101%	100%	100%
Unweighted N	(1,495)	(681)	(814)	(323)	(208)	(382)	(235)	(149)	(111)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
A great deal	40%	40%	34%	44%	40%	37%	39%	50%	48%	39%	35%	42%
Quite a bit	8%	8%	12%	9%	5%	7%	10%	10%	10%	9%	7%	10%
A moderate amount	11%	25%	12%	6%	10%	16%	11%	7%	7%	10%	11%	16%
Only a little	10%	6%	12%	8%	12%	11%	13%	6%	9%	9%	11%	9%
None at all	29%	20%	28%	32%	32%	27%	26%	27%	24%	32%	35%	22%
Not sure	1%	1%	2%	1%	1%	2%	0%	0%	2%	1%	1%	1%
Totals	99%	100%	100%	100%	100%	100%	99%	100%	100%	100%	100%	100%
Unweighted N	(1,495)	(191)	(305)	(612)	(387)	(520)	(437)	(372)	(242)	(372)	(498)	(383)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
A great deal	40%	80%	5%	74%	32%	8%	77%	44%	7%
Quite a bit	8%	12%	4%	10%	11%	4%	11%	10%	5%
A moderate amount	11%	6%	11%	11%	10%	13%	6%	14%	11%
Only a little	10%	1%	18%	3%	11%	17%	3%	8%	18%
None at all	29%	1%	61%	2%	33%	57%	2%	24%	57%
Not sure	1%	0%	2%	0%	2%	1%	0%	1%	2%
Totals	99%	100%	101%	100%	99%	100%	99%	101%	100%
Unweighted N	(1,495)	(799)	(597)	(604)	(427)	(464)	(483)	(487)	(482)

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24A. Agreement with Democracy Statements — Elected officials care what ordinary people think

Do you agree or disagree with the following:

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Strongly agree	7%	8%	7%	6%	5%	4%	4%	18%	13%
Somewhat agree	29%	26%	31%	22%	31%	26%	33%	32%	35%
Somewhat disagree	33%	34%	32%	29%	37%	36%	36%	27%	31%
Strongly disagree	26%	28%	24%	38%	25%	28%	21%	15%	19%
Not sure	5%	5%	6%	5%	3%	6%	6%	8%	2%
Totals	100%	101%	100%	100%	101%	100%	100%	100%	100%
Unweighted N	(1,478)	(674)	(804)	(320)	(207)	(376)	(233)	(145)	(110)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Strongly agree	7%	8%	14%	6%	3%	8%	7%	7%	9%	5%	8%	7%
Somewhat agree	29%	30%	24%	27%	33%	27%	30%	30%	34%	29%	25%	29%
Somewhat disagree	33%	39%	25%	36%	33%	36%	32%	33%	30%	32%	31%	40%
Strongly disagree	26%	16%	28%	28%	27%	25%	25%	27%	21%	28%	30%	21%
Not sure	5%	7%	9%	4%	3%	4%	7%	3%	5%	6%	6%	3%
Totals	100%	100%	100%	101%	99%	100%	101%	100%	99%	100%	100%	100%
Unweighted N	(1,478)	(189)	(305)	(608)	(376)	(511)	(431)	(370)	(236)	(368)	(494)	(380)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Strongly agree	7%	10%	4%	12%	2%	5%	9%	8%	5%
Somewhat agree	29%	41%	19%	42%	20%	21%	42%	27%	18%
Somewhat disagree	33%	33%	32%	31%	33%	36%	33%	32%	36%
Strongly disagree	26%	10%	41%	10%	37%	35%	11%	28%	37%
Not sure	5%	5%	4%	5%	7%	4%	4%	5%	4%
Totals	100%	99%	100%	100%	99%	101%	99%	100%	100%
Unweighted N	(1,478)	(790)	(590)	(600)	(421)	(457)	(478)	(483)	(476)

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24B. Agreement with Democracy Statements — No matter who wins an election, things do not change very much

Do you agree or disagree with the following:

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Strongly agree	8%	8%	8%	9%	6%	8%	3%	11%	15%
Somewhat agree	18%	21%	16%	19%	19%	17%	12%	19%	26%
Somewhat disagree	30%	28%	32%	28%	34%	29%	32%	29%	29%
Strongly disagree	40%	39%	41%	39%	40%	42%	49%	37%	27%
Not sure	3%	3%	3%	4%	1%	3%	4%	4%	4%
Totals	99%	99%	100%	99%	100%	99%	100%	100%	101%
Unweighted N	(1,480)	(672)	(808)	(317)	(207)	(378)	(235)	(148)	(109)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Strongly agree	8%	11%	16%	5%	4%	12%	8%	4%	9%	4%	11%	6%
Somewhat agree	18%	28%	23%	16%	12%	22%	17%	17%	17%	18%	16%	24%
Somewhat disagree	30%	27%	26%	35%	28%	28%	33%	31%	34%	31%	28%	28%
Strongly disagree	40%	29%	30%	42%	53%	34%	38%	47%	35%	44%	40%	40%
Not sure	3%	4%	5%	2%	3%	4%	4%	0%	5%	2%	4%	1%
Totals	99%	99%	100%	100%	100%	100%	100%	99%	100%	99%	99%	99%
Unweighted N	(1,480)	(190)	(301)	(606)	(383)	(513)	(434)	(367)	(241)	(367)	(493)	(379)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Strongly agree	8%	5%	6%	7%	11%	7%	9%	9%	7%
Somewhat agree	18%	17%	17%	19%	20%	16%	14%	24%	15%
Somewhat disagree	30%	35%	25%	33%	29%	28%	35%	30%	27%
Strongly disagree	40%	41%	49%	39%	34%	47%	40%	33%	50%
Not sure	3%	3%	3%	3%	5%	2%	1%	3%	2%
Totals	99%	101%	100%	101%	99%	100%	99%	99%	101%
Unweighted N	(1,480)	(792)	(591)	(600)	(423)	(457)	(477)	(484)	(476)

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24C. Agreement with Democracy Statements — The more people who vote, the better American democracy is

Do you agree or disagree with the following:

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Strongly agree	51%	51%	52%	44%	51%	51%	56%	57%	51%
Somewhat agree	26%	25%	28%	28%	24%	24%	28%	26%	31%
Somewhat disagree	11%	14%	9%	13%	18%	12%	7%	8%	11%
Strongly disagree	5%	6%	4%	6%	7%	5%	3%	3%	5%
Not sure	6%	5%	7%	9%	1%	9%	7%	5%	1%
Totals	99%	101%	100%	100%	101%	101%	101%	99%	99%
Unweighted N	(1,484)	(678)	(806)	(322)	(208)	(381)	(231)	(147)	(109)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Strongly agree	51%	47%	47%	57%	50%	47%	57%	56%	56%	53%	51%	47%
Somewhat agree	26%	30%	24%	26%	27%	29%	24%	25%	25%	26%	27%	28%
Somewhat disagree	11%	15%	12%	8%	14%	13%	9%	10%	10%	11%	11%	14%
Strongly disagree	5%	5%	7%	5%	3%	5%	3%	6%	5%	6%	4%	5%
Not sure	6%	3%	10%	4%	5%	6%	7%	3%	4%	4%	7%	6%
Totals	99%	100%	100%	100%	99%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,484)	(190)	(306)	(606)	(382)	(515)	(435)	(369)	(242)	(371)	(491)	(380)

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		2020 Vote		Party ID			Ideology		
	Total	Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Strongly agree	51%	76%	35%	72%	45%	34%	76%	53%	33%
Somewhat agree	26%	19%	33%	23%	28%	29%	19%	30%	28%
Somewhat disagree	11%	2%	15%	3%	14%	20%	2%	9%	21%
Strongly disagree	5%	1%	10%	1%	5%	10%	1%	3%	10%
Not sure	6%	2%	7%	2%	9%	8%	1%	5%	8%
Totals	99%	100%	100%	101%	101%	101%	99%	100%	100%
Unweighted N	(1,484)	(792)	(595)	(599)	(422)	(463)	(480)	(482)	(480)

The Economist/YouGov Poll
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24D. Agreement with Democracy Statements — Many citizens are not smart enough to vote

Do you agree or disagree with the following:

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Strongly agree	15%	19%	11%	18%	20%	13%	8%	11%	16%
Somewhat agree	24%	27%	22%	27%	31%	22%	23%	15%	25%
Somewhat disagree	21%	21%	21%	21%	21%	17%	31%	14%	16%
Strongly disagree	35%	28%	41%	28%	24%	42%	30%	55%	40%
Not sure	5%	5%	5%	6%	3%	6%	7%	5%	3%
Totals	100%	100%	100%	100%	99%	100%	99%	100%	100%
Unweighted N	(1,478)	(675)	(803)	(321)	(206)	(378)	(229)	(146)	(111)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Strongly agree	15%	11%	18%	14%	15%	13%	15%	15%	15%	13%	16%	14%
Somewhat agree	24%	25%	21%	26%	24%	20%	24%	31%	26%	24%	22%	26%
Somewhat disagree	21%	29%	19%	19%	19%	18%	22%	22%	20%	23%	16%	27%
Strongly disagree	35%	30%	35%	35%	38%	44%	34%	27%	33%	35%	39%	30%
Not sure	5%	4%	7%	6%	4%	5%	5%	4%	5%	5%	7%	3%
Totals	100%	99%	100%	100%	100%	100%	100%	99%	99%	100%	100%	100%
Unweighted N	(1,478)	(191)	(304)	(606)	(377)	(515)	(429)	(370)	(238)	(370)	(487)	(383)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Strongly agree	15%	9%	20%	9%	17%	19%	10%	15%	19%
Somewhat agree	24%	22%	30%	18%	29%	27%	23%	23%	27%
Somewhat disagree	21%	22%	18%	22%	20%	20%	24%	21%	18%
Strongly disagree	35%	43%	24%	47%	26%	29%	39%	38%	30%
Not sure	5%	3%	7%	4%	7%	5%	4%	3%	7%
Totals	100%	99%	99%	100%	99%	100%	100%	100%	101%
Unweighted N	(1,478)	(794)	(587)	(601)	(419)	(458)	(479)	(478)	(478)

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24E. Agreement with Democracy Statements — Americans should be required to pass a test before being allowed to vote

Do you agree or disagree with the following:

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Strongly agree	12%	17%	8%	22%	17%	10%	6%	6%	7%
Somewhat agree	17%	18%	17%	18%	15%	17%	18%	7%	27%
Somewhat disagree	18%	18%	18%	18%	21%	17%	20%	12%	19%
Strongly disagree	46%	41%	50%	36%	45%	46%	48%	69%	40%
Not sure	7%	6%	8%	7%	3%	10%	8%	6%	7%
Totals	100%	100%	101%	101%	101%	100%	100%	100%	100%
Unweighted N	(1,486)	(678)	(808)	(322)	(207)	(379)	(233)	(147)	(111)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Strongly agree	12%	10%	14%	13%	11%	13%	10%	10%	12%	13%	13%	10%
Somewhat agree	17%	24%	20%	15%	14%	17%	18%	19%	19%	15%	17%	19%
Somewhat disagree	18%	27%	19%	14%	18%	17%	19%	17%	16%	20%	16%	21%
Strongly disagree	46%	34%	39%	52%	49%	46%	45%	48%	46%	48%	47%	42%
Not sure	7%	4%	8%	7%	8%	7%	7%	6%	7%	5%	8%	7%
Totals	100%	99%	100%	101%	100%	100%	99%	100%	100%	101%	101%	99%
Unweighted N	(1,486)	(191)	(304)	(607)	(384)	(517)	(434)	(369)	(242)	(371)	(493)	(380)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Strongly agree	12%	4%	21%	4%	13%	21%	5%	9%	22%
Somewhat agree	17%	9%	24%	11%	19%	22%	12%	16%	22%
Somewhat disagree	18%	16%	19%	14%	18%	22%	15%	18%	20%
Strongly disagree	46%	65%	27%	65%	40%	29%	61%	50%	31%
Not sure	7%	5%	8%	5%	10%	6%	6%	7%	6%
Totals	100%	99%	99%	99%	100%	100%	99%	100%	101%
Unweighted N	(1,486)	(798)	(590)	(604)	(422)	(460)	(482)	(484)	(477)

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25. Voting a Privilege or a Right

Which comes closest to your opinion:

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Voting is a privilege	26%	22%	29%	26%	22%	32%	31%	11%	30%
Voting is a right	74%	78%	71%	74%	78%	68%	69%	89%	70%
Totals	100%	100%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,480)	(674)	(806)	(324)	(206)	(379)	(234)	(145)	(106)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Voting is a privilege	26%	17%	25%	24%	33%	26%	24%	26%	22%	25%	26%	28%
Voting is a right	74%	83%	75%	76%	67%	74%	76%	74%	78%	75%	74%	72%
Totals	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,480)	(188)	(300)	(611)	(381)	(512)	(435)	(370)	(240)	(369)	(488)	(383)

	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Voting is a privilege	26%	13%	40%	13%	26%	40%	11%	21%	41%
Voting is a right	74%	87%	60%	87%	74%	60%	89%	79%	59%
Totals	100%	100%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,480)	(792)	(594)	(599)	(422)	(459)	(476)	(485)	(477)

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26A. Election Theories — Mail ballots are being manipulated to favor Joe Biden

Do you think the following statements are true or not true?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Definitely true	30%	32%	29%	41%	31%	43%	21%	4%	25%
Probably true	15%	15%	16%	18%	13%	14%	20%	8%	18%
Probably not true	10%	11%	10%	12%	10%	9%	7%	13%	13%
Definitely not true	44%	42%	46%	30%	46%	34%	52%	75%	44%
Totals	99%	100%	101%	101%	100%	100%	100%	100%	100%
Unweighted N	(1,494)	(679)	(815)	(323)	(208)	(383)	(234)	(148)	(111)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Definitely true	30%	18%	25%	34%	36%	28%	28%	30%	23%	31%	36%	26%
Probably true	15%	23%	22%	9%	14%	17%	17%	12%	15%	15%	17%	14%
Probably not true	10%	12%	15%	9%	9%	13%	12%	6%	9%	11%	10%	12%
Definitely not true	44%	47%	38%	48%	42%	43%	43%	52%	53%	44%	38%	48%
Totals	99%	100%	100%	100%	101%	101%	100%	100%	100%	101%	101%	100%
Unweighted N	(1,494)	(190)	(306)	(611)	(387)	(520)	(438)	(371)	(243)	(372)	(496)	(383)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Definitely true	30%	1%	66%	4%	27%	62%	4%	20%	61%
Probably true	15%	2%	24%	5%	20%	23%	4%	18%	21%
Probably not true	10%	7%	8%	8%	15%	9%	4%	14%	11%
Definitely not true	44%	89%	3%	83%	38%	5%	87%	48%	6%
Totals	99%	99%	101%	100%	100%	99%	99%	100%	99%
Unweighted N	(1,494)	(801)	(595)	(606)	(424)	(464)	(483)	(488)	(481)

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26B. Election Theories — Illegal immigrants voted fraudulently in 2016 and tried again in 2020

Do you think the following statements are true or not true?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Definitely true	22%	24%	21%	28%	21%	31%	16%	7%	22%
Probably true	23%	24%	22%	29%	27%	26%	24%	13%	15%
Probably not true	19%	19%	19%	19%	13%	18%	14%	29%	23%
Definitely not true	36%	34%	37%	23%	39%	25%	46%	52%	40%
Totals	100%	101%	99%	99%	100%	100%	100%	101%	100%
Unweighted N	(1,482)	(676)	(806)	(318)	(209)	(379)	(234)	(144)	(111)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Definitely true	22%	9%	19%	25%	28%	22%	17%	25%	15%	23%	27%	19%
Probably true	23%	24%	25%	22%	22%	21%	29%	18%	24%	25%	23%	21%
Probably not true	19%	27%	22%	16%	17%	28%	15%	13%	17%	18%	18%	24%
Definitely not true	36%	40%	34%	38%	32%	28%	39%	44%	44%	35%	32%	36%
Totals	100%	100%	100%	101%	99%	99%	100%	100%	100%	101%	100%	100%
Unweighted N	(1,482)	(189)	(302)	(608)	(383)	(512)	(434)	(372)	(241)	(371)	(490)	(380)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Definitely true	22%	1%	49%	4%	20%	45%	4%	15%	45%
Probably true	23%	4%	39%	7%	27%	38%	4%	22%	39%
Probably not true	19%	20%	11%	22%	23%	13%	16%	30%	11%
Definitely not true	36%	74%	1%	68%	30%	4%	76%	33%	5%
Totals	100%	99%	100%	101%	100%	100%	100%	100%	100%
Unweighted N	(1,482)	(795)	(591)	(602)	(422)	(458)	(482)	(482)	(477)

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26C. Election Theories — Russia is attempting to influence the election in favor of President Trump

Do you think the following statements are true or not true?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Definitely true	18%	19%	17%	13%	19%	16%	16%	26%	22%
Probably true	28%	26%	30%	22%	32%	25%	33%	38%	30%
Probably not true	26%	24%	27%	31%	22%	27%	23%	20%	28%
Definitely not true	28%	30%	26%	34%	27%	32%	28%	16%	20%
Totals	100%	99%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,493)	(681)	(812)	(323)	(209)	(381)	(235)	(147)	(111)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Definitely true	18%	10%	18%	21%	18%	18%	15%	22%	20%	15%	17%	21%
Probably true	28%	42%	26%	27%	25%	29%	27%	33%	33%	28%	25%	32%
Probably not true	26%	21%	29%	22%	30%	27%	30%	18%	27%	25%	25%	25%
Definitely not true	28%	28%	27%	29%	27%	26%	28%	28%	20%	32%	32%	22%
Totals	100%	101%	100%	99%	100%	100%	100%	101%	100%	100%	99%	100%
Unweighted N	(1,493)	(191)	(305)	(609)	(388)	(517)	(437)	(373)	(243)	(371)	(495)	(384)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Definitely true	18%	34%	3%	35%	12%	4%	41%	15%	4%
Probably true	28%	45%	8%	42%	29%	13%	39%	37%	10%
Probably not true	26%	12%	35%	13%	29%	37%	13%	24%	38%
Definitely not true	28%	8%	54%	10%	30%	47%	7%	24%	48%
Totals	100%	99%	100%	100%	100%	101%	100%	100%	100%
Unweighted N	(1,493)	(799)	(595)	(605)	(424)	(464)	(483)	(485)	(483)

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26D. Election Theories — We will never know the real outcome of this election

Do you think the following statements are true or not true?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Definitely true	15%	15%	15%	18%	15%	23%	12%	5%	10%
Probably true	26%	27%	26%	34%	23%	28%	23%	19%	29%
Probably not true	17%	16%	18%	17%	17%	13%	18%	23%	20%
Definitely not true	41%	42%	41%	32%	46%	37%	47%	53%	40%
Totals	99%	100%	100%	101%	101%	101%	100%	100%	99%
Unweighted N	(1,493)	(682)	(811)	(324)	(209)	(382)	(234)	(147)	(110)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Definitely true	15%	16%	16%	13%	16%	16%	15%	13%	14%	17%	17%	9%
Probably true	26%	28%	30%	24%	26%	27%	28%	23%	25%	26%	25%	30%
Probably not true	17%	19%	21%	14%	19%	20%	16%	15%	14%	17%	20%	16%
Definitely not true	41%	37%	32%	49%	40%	36%	42%	49%	47%	40%	37%	45%
Totals	99%	100%	99%	100%	101%	99%	101%	100%	100%	100%	99%	100%
Unweighted N	(1,493)	(190)	(306)	(611)	(386)	(518)	(438)	(373)	(243)	(372)	(494)	(384)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Definitely true	15%	3%	27%	5%	14%	26%	4%	16%	23%
Probably true	26%	7%	46%	8%	29%	44%	5%	26%	44%
Probably not true	17%	15%	16%	18%	20%	15%	16%	18%	18%
Definitely not true	41%	76%	11%	68%	37%	14%	75%	40%	16%
Totals	99%	101%	100%	99%	100%	99%	100%	100%	101%
Unweighted N	(1,493)	(798)	(596)	(604)	(426)	(463)	(482)	(486)	(482)

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26E. Election Theories — Many people were illegally prevented from voting this year

Do you think the following statements are true or not true?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Definitely true	11%	13%	10%	9%	13%	11%	6%	13%	21%
Probably true	31%	28%	33%	33%	25%	32%	32%	28%	31%
Probably not true	35%	35%	35%	35%	38%	31%	40%	36%	29%
Definitely not true	23%	24%	22%	23%	25%	26%	22%	22%	19%
Totals	100%	100%	100%	100%	101%	100%	100%	99%	100%
Unweighted N	(1,490)	(680)	(810)	(323)	(209)	(380)	(234)	(147)	(110)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Definitely true	11%	15%	14%	10%	9%	13%	10%	12%	15%	9%	11%	12%
Probably true	31%	41%	33%	28%	27%	34%	27%	29%	29%	31%	30%	32%
Probably not true	35%	29%	34%	34%	40%	35%	38%	33%	37%	32%	35%	37%
Definitely not true	23%	15%	20%	28%	23%	18%	25%	26%	19%	27%	25%	19%
Totals	100%	100%	101%	100%	99%	100%	100%	100%	100%	99%	101%	100%
Unweighted N	(1,490)	(190)	(304)	(610)	(386)	(516)	(438)	(370)	(244)	(371)	(493)	(382)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Definitely true	11%	14%	9%	17%	7%	9%	18%	9%	8%
Probably true	31%	36%	21%	36%	30%	25%	38%	30%	25%
Probably not true	35%	30%	37%	28%	41%	38%	27%	37%	39%
Definitely not true	23%	20%	33%	20%	22%	28%	17%	23%	27%
Totals	100%	100%	100%	101%	100%	100%	100%	99%	99%
Unweighted N	(1,490)	(798)	(593)	(604)	(425)	(461)	(483)	(486)	(479)

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27. Voter Fraud Occur

How much voter fraud do you think occurred in this election?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Enough to influence the outcome	40%	42%	38%	56%	38%	53%	33%	12%	29%
Not enough to influence the outcome	35%	34%	35%	27%	40%	26%	42%	48%	34%
None	17%	17%	16%	10%	17%	14%	13%	33%	17%
Not sure	9%	7%	11%	7%	4%	7%	12%	8%	21%
Totals	101%	100%	100%	100%	99%	100%	100%	101%	101%
Unweighted N	(1,491)	(678)	(813)	(322)	(208)	(383)	(234)	(148)	(109)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Enough to influence the outcome	40%	33%	36%	40%	46%	40%	37%	39%	29%	43%	47%	34%
Not enough to influence the outcome	35%	36%	35%	37%	32%	32%	39%	40%	38%	38%	28%	41%
None	17%	18%	14%	18%	16%	17%	15%	16%	22%	14%	15%	17%
Not sure	9%	13%	15%	6%	6%	11%	9%	4%	11%	6%	10%	8%
Totals	101%	100%	100%	101%	100%	100%	100%	99%	100%	101%	100%	100%
Unweighted N	(1,491)	(191)	(303)	(611)	(386)	(518)	(436)	(372)	(241)	(370)	(496)	(384)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Enough to influence the outcome	40%	3%	81%	7%	39%	78%	4%	32%	76%
Not enough to influence the outcome	35%	59%	10%	52%	38%	12%	57%	41%	13%
None	17%	32%	1%	34%	9%	2%	32%	15%	5%
Not sure	9%	5%	8%	6%	14%	8%	6%	12%	7%
Totals	101%	99%	100%	99%	100%	100%	99%	100%	101%
Unweighted N	(1,491)	(797)	(597)	(603)	(424)	(464)	(481)	(487)	(480)

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28. Voter Fraud Occur - State

How much voter fraud do you think occurred in [State] this election?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Enough to influence the outcome	22%	19%	24%	23%	14%	30%	22%	9%	31%
Not enough to influence the outcome	44%	49%	40%	48%	56%	35%	48%	38%	34%
None	24%	23%	24%	18%	24%	23%	22%	36%	21%
Not sure	11%	9%	12%	11%	6%	12%	8%	17%	14%
Totals	101%	100%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,493)	(679)	(814)	(324)	(208)	(382)	(235)	(146)	(111)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Enough to influence the outcome	22%	22%	26%	19%	23%	25%	18%	21%	21%	23%	19%	25%
Not enough to influence the outcome	44%	41%	42%	45%	46%	38%	51%	46%	37%	47%	48%	40%
None	24%	24%	18%	26%	25%	23%	22%	26%	33%	21%	20%	25%
Not sure	11%	14%	14%	11%	7%	13%	10%	7%	10%	8%	13%	10%
Totals	101%	101%	100%	101%	101%	99%	101%	100%	101%	99%	100%	100%
Unweighted N	(1,493)	(191)	(303)	(612)	(387)	(519)	(436)	(372)	(243)	(370)	(496)	(384)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Enough to influence the outcome	22%	6%	39%	7%	21%	40%	7%	19%	36%
Not enough to influence the outcome	44%	47%	43%	44%	49%	40%	46%	46%	43%
None	24%	41%	7%	42%	16%	9%	41%	24%	9%
Not sure	11%	6%	11%	7%	14%	12%	5%	11%	11%
Totals	101%	100%	100%	100%	100%	101%	99%	100%	99%
Unweighted N	(1,493)	(798)	(597)	(604)	(425)	(464)	(482)	(486)	(482)

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29. Approval of Voting by Mail

Do you approve or disapprove of voting by mail?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Strongly approve	44%	42%	46%	31%	45%	35%	52%	66%	52%
Somewhat approve	14%	13%	15%	12%	10%	13%	14%	17%	19%
Somewhat disapprove	13%	12%	13%	15%	13%	14%	14%	8%	9%
Strongly disapprove	27%	31%	24%	39%	33%	35%	21%	5%	15%
Not sure	2%	3%	2%	2%	0%	3%	0%	4%	5%
Totals	100%	101%	100%	99%	101%	100%	101%	100%	100%
Unweighted N	(1,498)	(681)	(817)	(323)	(209)	(384)	(235)	(149)	(111)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Strongly approve	44%	45%	43%	47%	41%	42%	43%	52%	48%	44%	38%	52%
Somewhat approve	14%	16%	15%	11%	15%	17%	12%	12%	16%	10%	13%	16%
Somewhat disapprove	13%	16%	12%	13%	11%	14%	14%	10%	9%	14%	13%	13%
Strongly disapprove	27%	17%	26%	27%	32%	24%	27%	26%	26%	28%	33%	17%
Not sure	2%	7%	3%	1%	1%	3%	3%	0%	1%	3%	3%	2%
Totals	100%	101%	99%	99%	100%	100%	99%	100%	100%	99%	100%	100%
Unweighted N	(1,498)	(191)	(305)	(613)	(389)	(520)	(439)	(373)	(244)	(372)	(497)	(385)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Strongly approve	44%	82%	10%	78%	38%	12%	88%	44%	11%
Somewhat approve	14%	11%	12%	14%	14%	13%	7%	18%	15%
Somewhat disapprove	13%	4%	19%	5%	16%	18%	3%	14%	19%
Strongly disapprove	27%	2%	57%	2%	28%	54%	1%	21%	53%
Not sure	2%	1%	2%	1%	4%	3%	0%	3%	3%
Totals	100%	100%	100%	100%	100%	100%	99%	100%	101%
Unweighted N	(1,498)	(801)	(598)	(606)	(426)	(466)	(483)	(488)	(484)

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30. Which Mail Ballots Should Be Counted

Which of the following best describes how election officials should count mail ballots?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Mail ballots should not be permitted	16%	19%	14%	24%	18%	19%	12%	7%	8%
Only mail ballots that arrive by Election Day should be counted	30%	30%	30%	36%	30%	34%	29%	20%	28%
Mail ballots that are postmarked on or before Election Day should be counted, as long as they arrive within a few days of the election	54%	51%	56%	41%	53%	46%	59%	73%	63%
Totals	100%	100%	100%	101%	101%	99%	100%	100%	99%
Unweighted N	(1,495)	(680)	(815)	(323)	(209)	(384)	(235)	(149)	(108)

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	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Mail ballots should not be permitted	16%	10%	19%	15%	18%	15%	16%	14%	15%	16%	20%	10%
Only mail ballots that arrive by Election Day should be counted	30%	30%	33%	28%	32%	32%	31%	27%	25%	37%	30%	28%
Mail ballots that are postmarked on or before Election Day should be counted, as long as they arrive within a few days of the election	54%	60%	48%	58%	49%	53%	53%	59%	60%	47%	50%	62%
Totals	100%	100%	100%	101%	99%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,495)	(190)	(304)	(612)	(389)	(518)	(438)	(373)	(242)	(372)	(497)	(384)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Mail ballots should not be permitted	16%	1%	31%	3%	18%	29%	2%	12%	31%
Only mail ballots that arrive by Election Day should be counted	30%	10%	51%	12%	32%	49%	9%	32%	45%
Mail ballots that are postmarked on or before Election Day should be counted, as long as they arrive within a few days of the election	54%	88%	17%	85%	50%	22%	90%	55%	24%
Totals	100%	99%	99%	100%	100%	100%	101%	99%	100%
Unweighted N	(1,495)	(800)	(598)	(603)	(426)	(466)	(484)	(485)	(483)

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31. More Mail Ballots Future

In the next election, do you think there will be more mail ballots, fewer mail ballots, or about the same amount?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
More mail ballots	31%	34%	29%	31%	37%	26%	27%	36%	35%
About the same amount of mail ballots	32%	28%	36%	29%	23%	33%	36%	42%	39%
Fewer mail ballots	37%	38%	35%	41%	40%	41%	37%	22%	26%
Totals	100%	100%	100%	101%	100%	100%	100%	100%	100%
Unweighted N	(1,492)	(681)	(811)	(323)	(209)	(380)	(233)	(149)	(111)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
More mail ballots	31%	21%	29%	32%	37%	31%	28%	35%	30%	29%	30%	36%
About the same amount of mail ballots	32%	35%	34%	33%	28%	35%	32%	30%	30%	27%	35%	35%
Fewer mail ballots	37%	43%	37%	35%	35%	34%	39%	35%	41%	43%	35%	29%
Totals	100%	99%	100%	100%	100%	100%	99%	100%	101%	99%	100%	100%
Unweighted N	(1,492)	(191)	(306)	(609)	(386)	(518)	(435)	(373)	(243)	(371)	(496)	(382)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
More mail ballots	31%	39%	27%	38%	30%	24%	39%	26%	29%
About the same amount of mail ballots	32%	35%	25%	41%	27%	28%	36%	36%	25%
Fewer mail ballots	37%	26%	48%	21%	44%	48%	25%	37%	46%
Totals	100%	100%	100%	100%	101%	100%	100%	99%	100%
Unweighted N	(1,492)	(799)	(594)	(605)	(426)	(461)	(482)	(488)	(479)

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32. Recount Confidence

Some states may do recounts of the vote. Would a recount make you more or less confident in the outcome of the election?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Much more confident	12%	10%	14%	11%	8%	20%	7%	13%	14%
More confident	32%	34%	29%	39%	36%	29%	35%	15%	30%
No change	51%	52%	51%	47%	52%	45%	55%	62%	50%
Less confident	3%	3%	4%	3%	3%	4%	2%	5%	5%
Much less confident	1%	1%	1%	0%	1%	1%	0%	4%	1%
Totals	99%	100%	99%	100%	100%	99%	99%	99%	100%
Unweighted N	(1,498)	(682)	(816)	(324)	(209)	(383)	(235)	(149)	(111)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Much more confident	12%	8%	13%	15%	11%	17%	10%	9%	7%	14%	13%	13%
More confident	32%	35%	35%	26%	36%	32%	32%	32%	25%	34%	36%	27%
No change	51%	46%	47%	56%	51%	46%	53%	58%	62%	49%	46%	53%
Less confident	3%	7%	5%	2%	2%	4%	4%	1%	5%	1%	3%	5%
Much less confident	1%	4%	1%	1%	1%	2%	1%	0%	1%	2%	1%	1%
Totals	99%	100%	101%	100%	101%	101%	100%	100%	100%	100%	99%	99%
Unweighted N	(1,498)	(191)	(306)	(613)	(388)	(521)	(438)	(373)	(243)	(373)	(498)	(384)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Much more confident	12%	6%	19%	8%	10%	19%	6%	11%	19%
More confident	32%	14%	48%	17%	32%	48%	15%	31%	46%
No change	51%	76%	29%	71%	53%	27%	75%	53%	31%
Less confident	3%	3%	3%	3%	4%	3%	3%	4%	3%
Much less confident	1%	1%	1%	1%	1%	2%	1%	1%	1%
Totals	99%	100%	100%	100%	100%	99%	100%	100%	100%
Unweighted N	(1,498)	(802)	(598)	(606)	(427)	(465)	(484)	(489)	(482)

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33. Election Expectation

Before the election, what did you expect would happen:

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Joe Biden would win both the Electoral College and the popular vote	40%	40%	39%	27%	47%	30%	46%	61%	41%
Joe Biden would win the Electoral College but Donald Trump would win the popular vote	7%	5%	10%	4%	3%	6%	7%	16%	16%
Donald Trump would win the Electoral College but Joe Biden would win the popular vote	30%	36%	25%	43%	36%	20%	27%	19%	27%
Donald Trump would win both the Electoral College and the popular vote	23%	19%	26%	26%	14%	44%	20%	4%	15%
Totals	100%	100%	100%	100%	100%	100%	100%	100%	99%
Unweighted N	(1,413)	(649)	(764)	(312)	(197)	(355)	(221)	(138)	(109)

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	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Joe Biden would win both the Electoral College and the popular vote	40%	37%	32%	45%	41%	36%	38%	47%	48%	38%	33%	47%
Joe Biden would win the Electoral College but Donald Trump would win the popular vote	7%	11%	13%	6%	2%	12%	8%	3%	7%	4%	10%	6%
Donald Trump would win the Electoral College but Joe Biden would win the popular vote	30%	40%	33%	26%	27%	25%	33%	34%	27%	33%	30%	29%
Donald Trump would win both the Electoral College and the popular vote	23%	12%	21%	24%	29%	27%	21%	16%	19%	24%	27%	18%
Totals	100%	100%	99%	101%	99%	100%	100%	100%	101%	99%	100%	100%
Unweighted N	(1,413)	(183)	(294)	(574)	(362)	(481)	(418)	(353)	(231)	(357)	(467)	(358)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Joe Biden would win both the Electoral College and the popular vote	40%	75%	8%	70%	35%	10%	71%	42%	13%
Joe Biden would win the Electoral College but Donald Trump would win the popular vote	7%	7%	4%	9%	5%	8%	7%	6%	8%
Donald Trump would win the Electoral College but Joe Biden would win the popular vote	30%	17%	41%	18%	37%	38%	19%	34%	36%
Donald Trump would win both the Electoral College and the popular vote	23%	1%	47%	3%	23%	44%	3%	17%	44%
Totals	100%	100%	100%	100%	100%	100%	100%	99%	101%
Unweighted N	(1,413)	(753)	(565)	(566)	(408)	(439)	(456)	(463)	(455)

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34. Enthusiastic about Election Results

How do you feel about the results of the 2020 presidential election?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Enthusiastic	36%	32%	40%	24%	31%	30%	41%	65%	40%
Satisfied but not enthusiastic	16%	16%	16%	8%	19%	11%	16%	19%	30%
Dissatisfied but not upset	16%	21%	11%	32%	15%	12%	11%	5%	13%
Upset	28%	27%	30%	31%	34%	44%	27%	6%	13%
Not sure	4%	4%	4%	5%	1%	4%	4%	6%	4%
Totals	100%	100%	101%	100%	100%	101%	99%	101%	100%
Unweighted N	(1,498)	(683)	(815)	(324)	(209)	(383)	(235)	(149)	(111)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Enthusiastic	36%	31%	30%	40%	38%	34%	33%	44%	46%	33%	35%	34%
Satisfied but not enthusiastic	16%	30%	23%	14%	7%	19%	18%	14%	16%	14%	13%	23%
Dissatisfied but not upset	16%	18%	18%	13%	15%	15%	19%	11%	11%	20%	14%	17%
Upset	28%	16%	23%	30%	38%	26%	25%	30%	24%	28%	34%	23%
Not sure	4%	5%	7%	3%	2%	5%	5%	1%	4%	5%	4%	3%
Totals	100%	100%	101%	100%	100%	99%	100%	100%	101%	100%	100%	100%
Unweighted N	(1,498)	(191)	(306)	(613)	(388)	(521)	(438)	(373)	(244)	(373)	(497)	(384)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Enthusiastic	36%	74%	2%	73%	23%	5%	71%	38%	7%
Satisfied but not enthusiastic	16%	23%	4%	20%	24%	6%	26%	18%	7%
Dissatisfied but not upset	16%	1%	25%	4%	19%	25%	2%	21%	22%
Upset	28%	1%	65%	2%	27%	59%	1%	17%	61%
Not sure	4%	1%	3%	1%	7%	4%	0%	6%	3%
Totals	100%	100%	99%	100%	100%	99%	100%	100%	100%
Unweighted N	(1,498)	(800)	(599)	(605)	(427)	(466)	(484)	(487)	(484)

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35. Anger at Election Outcome

Would you say that you are angry about the results of the 2020 presidential election?

Among those upset at the election outcome

	Gender			White Men		White Women		Race	
	Total	Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Yes	84%	86%	83%	90%	78%	90%	76%	*	*
No	9%	7%	11%	3%	13%	5%	15%	*	*
Not sure	7%	7%	6%	6%	9%	5%	10%	*	*
Totals	100%	100%	100%	99%	100%	100%	101%	*	*
Unweighted N	(393)	(181)	(212)	(100)	(56)	(139)	(51)	(9)	(13)

	Age					Income			Region			
	Total	18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Yes	84%	*	76%	87%	85%	88%	75%	84%	73%	83%	84%	94%
No	9%	*	12%	6%	9%	6%	16%	9%	19%	9%	8%	3%
Not sure	7%	*	12%	7%	5%	6%	9%	6%	8%	8%	7%	3%
Totals	100%	*	100%	100%	99%	100%	100%	99%	100%	100%	99%	100%
Unweighted N	(393)	(24)	(70)	(165)	(134)	(130)	(108)	(94)	(52)	(90)	(163)	(88)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Yes	84%	*	85%	*	77%	87%	*	81%	86%
No	9%	*	9%	*	11%	8%	*	8%	8%
Not sure	7%	*	6%	*	12%	5%	*	10%	6%
Totals	100%	*	100%	*	100%	100%	*	99%	100%
Unweighted N	(393)	(4)	(377)	(10)	(112)	(271)	(7)	(81)	(297)

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36. Amend the Constitution

When it comes to U.S. presidential elections which would you prefer?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Amend the Constitution so the candidate who receives the most total votes nationwide wins the election	45%	39%	50%	31%	37%	46%	49%	57%	57%
Keep the current system where the candidate who wins the most votes in the Electoral College wins the election	44%	53%	36%	60%	55%	37%	39%	29%	32%
Not sure	12%	9%	15%	9%	8%	17%	12%	13%	10%
Totals	101%	101%	101%	100%	100%	100%	100%	99%	99%
Unweighted N	(1,418)	(652)	(766)	(314)	(198)	(358)	(220)	(138)	(109)

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	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Amend the Constitution so the candidate who receives the most total votes nationwide wins the election	45%	48%	50%	46%	36%	48%	41%	49%	55%	38%	40%	51%
Keep the current system where the candidate who wins the most votes in the Electoral College wins the election	44%	38%	36%	45%	51%	37%	45%	46%	36%	48%	48%	37%
Not sure	12%	14%	14%	9%	12%	15%	15%	5%	9%	14%	12%	12%
Totals	101%	100%	100%	100%	99%	100%	101%	100%	100%	100%	100%	100%
Unweighted N	(1,418)	(183)	(294)	(575)	(366)	(482)	(421)	(354)	(231)	(357)	(467)	(363)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Amend the Constitution so the candidate who receives the most total votes nationwide wins the election	45%	70%	15%	72%	37%	20%	81%	45%	17%
Keep the current system where the candidate who wins the most votes in the Electoral College wins the election	44%	17%	77%	18%	46%	71%	10%	40%	74%
Not sure	12%	12%	8%	10%	17%	9%	8%	16%	9%
Totals	101%	99%	100%	100%	100%	100%	99%	101%	100%
Unweighted N	(1,418)	(757)	(566)	(567)	(412)	(439)	(456)	(467)	(456)

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37. Enthusiastic about Biden Presidency

How do you feel about the next 4 years with Joe Biden as president?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Enthusiastic	35%	32%	37%	21%	31%	31%	39%	63%	40%
Satisfied but not enthusiastic	15%	14%	17%	8%	17%	8%	19%	20%	22%
Dissatisfied but not upset	16%	20%	12%	25%	18%	14%	12%	5%	15%
Upset	31%	31%	30%	42%	33%	42%	29%	6%	18%
Not sure	3%	2%	4%	3%	1%	5%	3%	6%	4%
Totals	100%	99%	100%	99%	100%	100%	102%	100%	99%
Unweighted N	(1,494)	(682)	(812)	(324)	(208)	(381)	(234)	(150)	(110)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Enthusiastic	35%	27%	29%	42%	35%	33%	33%	43%	44%	31%	33%	34%
Satisfied but not enthusiastic	15%	30%	21%	11%	9%	18%	17%	12%	17%	15%	11%	21%
Dissatisfied but not upset	16%	22%	19%	13%	13%	16%	18%	14%	10%	20%	15%	17%
Upset	31%	16%	25%	32%	41%	29%	29%	30%	25%	32%	35%	26%
Not sure	3%	5%	6%	2%	2%	4%	4%	1%	4%	2%	5%	1%
Totals	100%	100%	100%	100%	100%	100%	101%	100%	100%	100%	99%	99%
Unweighted N	(1,494)	(191)	(307)	(610)	(386)	(521)	(437)	(371)	(243)	(373)	(497)	(381)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Enthusiastic	35%	72%	1%	72%	23%	3%	70%	37%	6%
Satisfied but not enthusiastic	15%	24%	3%	20%	20%	6%	23%	18%	6%
Dissatisfied but not upset	16%	2%	24%	3%	19%	27%	4%	18%	23%
Upset	31%	1%	68%	2%	31%	62%	2%	22%	63%
Not sure	3%	2%	3%	2%	7%	1%	1%	5%	2%
Totals	100%	101%	99%	99%	100%	99%	100%	100%	100%
Unweighted N	(1,494)	(800)	(595)	(605)	(424)	(465)	(481)	(488)	(482)

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38. Biden Legitimately Won

Would you say that Joe Biden legitimately won the election, or not?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Biden legitimately won the election	58%	55%	60%	38%	61%	43%	64%	93%	72%
Biden did NOT legitimately win the election	42%	45%	40%	62%	39%	57%	36%	7%	28%
Totals	100%	100%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,487)	(680)	(807)	(322)	(209)	(378)	(235)	(147)	(110)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Biden legitimately won the election	58%	64%	61%	59%	51%	58%	59%	62%	67%	56%	52%	64%
Biden did NOT legitimately win the election	42%	36%	39%	41%	49%	42%	41%	38%	33%	44%	48%	36%
Totals	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,487)	(190)	(304)	(609)	(384)	(513)	(435)	(373)	(243)	(371)	(492)	(381)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Biden legitimately won the election	58%	99%	14%	96%	53%	18%	97%	63%	21%
Biden did NOT legitimately win the election	42%	1%	86%	4%	47%	82%	3%	37%	79%
Totals	100%	100%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,487)	(798)	(591)	(604)	(424)	(459)	(484)	(483)	(478)

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39. Should Trump Concede

Do you think Donald Trump should concede the election, or not?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
He should concede	60%	59%	60%	48%	62%	49%	68%	79%	69%
He should NOT concede	40%	41%	40%	52%	38%	51%	32%	21%	31%
Totals	100%	100%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,488)	(679)	(809)	(323)	(208)	(379)	(234)	(149)	(109)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
He should concede	60%	66%	62%	60%	55%	60%	62%	64%	66%	58%	55%	66%
He should NOT concede	40%	34%	38%	40%	45%	40%	38%	36%	34%	42%	45%	34%
Totals	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,488)	(189)	(305)	(609)	(385)	(517)	(435)	(371)	(242)	(369)	(495)	(382)

	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
He should concede	60%	94%	22%	90%	58%	27%	97%	67%	25%
He should NOT concede	40%	6%	78%	10%	42%	73%	3%	33%	75%
Totals	100%	100%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,488)	(801)	(591)	(606)	(423)	(459)	(484)	(485)	(477)

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40. Should Trump Sue

Do you think Donald Trump should contest the results of the election in court?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
He should contest the election in court	46%	49%	42%	63%	47%	55%	40%	15%	38%
He should NOT contest the election in court	54%	51%	58%	37%	53%	45%	60%	85%	62%
Totals	100%	100%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,490)	(679)	(811)	(322)	(209)	(382)	(235)	(148)	(108)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
He should contest the election in court	46%	36%	48%	45%	50%	46%	43%	44%	35%	48%	52%	41%
He should NOT contest the election in court	54%	64%	52%	55%	50%	54%	57%	56%	65%	52%	48%	59%
Totals	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,490)	(189)	(306)	(609)	(386)	(516)	(437)	(372)	(244)	(369)	(497)	(380)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
He should contest the election in court	46%	5%	89%	9%	47%	86%	8%	40%	81%
He should NOT contest the election in court	54%	95%	11%	91%	53%	14%	92%	60%	19%
Totals	100%	100%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,490)	(799)	(594)	(604)	(423)	(463)	(483)	(484)	(481)

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41. Will Trump Suits Change Election

If Donald Trump contests the results of the election in court, do you think it will change the outcome of the election?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
It will change the outcome of the election	33%	33%	34%	42%	27%	46%	26%	15%	30%
It will NOT change the outcome of the election	67%	67%	66%	58%	73%	54%	74%	85%	70%
Totals	100%	100%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,489)	(680)	(809)	(322)	(209)	(380)	(233)	(148)	(110)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
It will change the outcome of the election	33%	36%	37%	31%	32%	38%	31%	27%	26%	35%	38%	31%
It will NOT change the outcome of the election	67%	64%	63%	69%	68%	62%	69%	73%	74%	65%	62%	69%
Totals	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,489)	(190)	(305)	(608)	(386)	(518)	(433)	(372)	(242)	(371)	(492)	(384)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
It will change the outcome of the election	33%	4%	62%	7%	35%	62%	6%	30%	58%
It will NOT change the outcome of the election	67%	96%	38%	93%	65%	38%	94%	70%	42%
Totals	100%	100%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,489)	(800)	(591)	(605)	(423)	(461)	(484)	(485)	(477)

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42. Unified Government

Which is better?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Unified government - the President and majorities in both houses of Congress are from the same party	33%	36%	31%	33%	28%	32%	25%	46%	41%
Divided government - the President and the majority in at least one of the houses of Congress are from different parties	41%	42%	40%	46%	49%	43%	44%	22%	33%
Not sure	26%	22%	29%	21%	23%	26%	31%	32%	26%
Totals	100%	100%	100%	100%	100%	101%	100%	100%	100%
Unweighted N	(1,496)	(680)	(816)	(324)	(207)	(383)	(235)	(150)	(111)

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	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Unified government - the President and majorities in both houses of Congress are from the same party	33%	44%	33%	31%	30%	36%	30%	34%	38%	28%	30%	39%
Divided government - the President and the majority in at least one of the houses of Congress are from different parties	41%	33%	39%	41%	48%	36%	46%	44%	35%	45%	44%	38%
Not sure	26%	23%	28%	28%	22%	28%	24%	22%	27%	27%	26%	23%
Totals	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,496)	(190)	(306)	(613)	(387)	(520)	(437)	(373)	(244)	(372)	(496)	(384)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Unified government - the President and majorities in both houses of Congress are from the same party	33%	46%	20%	49%	24%	23%	52%	30%	21%
Divided government - the President and the majority in at least one of the houses of Congress are from different parties	41%	25%	60%	23%	47%	58%	19%	45%	58%
Not sure	26%	30%	20%	28%	29%	20%	29%	25%	20%
Totals	100%	101%	100%	100%	100%	101%	100%	100%	99%
Unweighted N	(1,496)	(801)	(597)	(607)	(425)	(464)	(484)	(487)	(482)

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43. Compromise or Push Agenda

At the moment it appears that the Senate and the President may be of different parties and favor different policies. Would you rather they...

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Work together in order and compromise in order to get more done	80%	76%	84%	75%	69%	79%	86%	90%	87%
Stick to their principles, no matter what, even if less is accomplished	20%	24%	16%	25%	31%	21%	14%	10%	13%
Totals	100%	100%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,486)	(678)	(808)	(322)	(208)	(378)	(233)	(148)	(110)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Work together in order and compromise in order to get more done	80%	82%	84%	82%	75%	84%	82%	77%	84%	80%	78%	81%
Stick to their principles, no matter what, even if less is accomplished	20%	18%	16%	18%	25%	16%	18%	23%	16%	20%	22%	19%
Totals	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,486)	(189)	(305)	(607)	(385)	(514)	(438)	(370)	(242)	(370)	(492)	(382)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Work together in order and compromise in order to get more done	80%	96%	61%	95%	78%	66%	96%	86%	64%
Stick to their principles, no matter what, even if less is accomplished	20%	4%	39%	5%	22%	34%	4%	14%	36%
Totals	100%	100%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,486)	(796)	(591)	(602)	(424)	(460)	(481)	(484)	(478)

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44. Likelihood of a Peaceful Transition of Power

How likely do you think it is that there will be a peaceful transition of power in January?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Very likely	21%	27%	16%	22%	37%	13%	20%	22%	15%
Somewhat likely	26%	31%	22%	29%	32%	16%	30%	14%	39%
Not very likely	25%	20%	29%	25%	17%	34%	23%	29%	19%
Not likely at all	17%	13%	21%	15%	7%	24%	16%	21%	15%
Not sure	11%	9%	12%	8%	7%	12%	12%	13%	12%
Totals	100%	100%	100%	99%	100%	99%	101%	99%	100%
Unweighted N	(1,499)	(682)	(817)	(323)	(209)	(384)	(235)	(150)	(111)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Very likely	21%	14%	17%	23%	25%	15%	21%	30%	16%	20%	24%	20%
Somewhat likely	26%	30%	30%	22%	27%	24%	27%	30%	31%	25%	22%	30%
Not very likely	25%	34%	23%	25%	22%	28%	27%	18%	24%	24%	26%	25%
Not likely at all	17%	18%	17%	17%	17%	21%	17%	12%	16%	20%	18%	15%
Not sure	11%	4%	13%	13%	9%	12%	8%	11%	12%	11%	10%	11%
Totals	100%	100%	100%	100%	100%	100%	100%	101%	99%	100%	100%	101%
Unweighted N	(1,499)	(191)	(306)	(613)	(389)	(522)	(439)	(373)	(244)	(373)	(497)	(385)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Very likely	21%	18%	28%	18%	20%	25%	16%	20%	26%
Somewhat likely	26%	27%	22%	27%	27%	24%	31%	26%	23%
Not very likely	25%	30%	16%	29%	25%	20%	31%	26%	19%
Not likely at all	17%	18%	19%	18%	14%	19%	15%	19%	18%
Not sure	11%	7%	15%	8%	14%	12%	7%	9%	13%
Totals	100%	100%	100%	100%	100%	100%	100%	100%	99%
Unweighted N	(1,499)	(802)	(598)	(606)	(427)	(466)	(483)	(489)	(484)

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45. Following News

How closely are you following the news about COVID-19?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Very closely	46%	47%	45%	36%	58%	40%	55%	49%	48%
Somewhat closely	35%	34%	36%	38%	32%	41%	30%	32%	35%
Not very closely	12%	12%	12%	16%	8%	11%	12%	13%	13%
Not following at all	6%	7%	6%	10%	2%	8%	2%	5%	4%
Totals	99%	100%	99%	100%	100%	100%	99%	99%	100%
Unweighted N	(1,499)	(683)	(816)	(324)	(209)	(384)	(235)	(150)	(110)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Very closely	46%	24%	44%	52%	52%	40%	49%	56%	48%	47%	47%	43%
Somewhat closely	35%	44%	29%	35%	36%	37%	33%	34%	37%	35%	34%	38%
Not very closely	12%	19%	18%	9%	9%	14%	13%	8%	10%	12%	14%	11%
Not following at all	6%	13%	10%	4%	2%	8%	5%	2%	5%	6%	6%	8%
Totals	99%	100%	101%	100%	99%	99%	100%	100%	100%	100%	101%	100%
Unweighted N	(1,499)	(190)	(307)	(613)	(389)	(521)	(439)	(373)	(244)	(373)	(497)	(385)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Very closely	46%	62%	36%	61%	41%	34%	62%	48%	35%
Somewhat closely	35%	31%	40%	30%	35%	41%	31%	32%	42%
Not very closely	12%	6%	16%	6%	16%	17%	5%	12%	16%
Not following at all	6%	1%	8%	3%	8%	8%	2%	8%	7%
Totals	99%	100%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,499)	(801)	(599)	(606)	(427)	(466)	(483)	(489)	(484)

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46. People I Know – Has Been Laid Off from Work Due to COVID-19

Do you personally know anyone who... [has been laid off from work due to covid-19]? Check all that apply.

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Yes, me	12%	11%	12%	12%	10%	12%	10%	17%	15%
Yes, a family member	18%	15%	21%	16%	14%	16%	20%	22%	25%
Yes, a close friend	22%	22%	21%	18%	29%	18%	24%	16%	27%
No	55%	58%	53%	61%	55%	62%	53%	52%	34%
Prefer not to say	1%	1%	1%	1%	1%	1%	0%	3%	1%
Unweighted N	(1,500)	(683)	(817)	(324)	(209)	(384)	(235)	(150)	(111)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Yes, me	12%	18%	20%	9%	5%	15%	13%	9%	14%	10%	12%	11%
Yes, a family member	18%	22%	21%	17%	16%	21%	19%	17%	21%	15%	17%	21%
Yes, a close friend	22%	31%	24%	23%	14%	21%	20%	27%	19%	23%	21%	23%
No	55%	46%	46%	57%	64%	53%	55%	52%	57%	59%	55%	50%
Prefer not to say	1%	3%	2%	0%	1%	2%	1%	0%	1%	2%	1%	1%
Unweighted N	(1,500)	(191)	(307)	(613)	(389)	(522)	(439)	(373)	(244)	(373)	(498)	(385)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Yes, me	12%	10%	10%	12%	11%	12%	11%	13%	11%
Yes, a family member	18%	21%	14%	20%	21%	14%	20%	18%	17%
Yes, a close friend	22%	27%	16%	25%	25%	15%	29%	24%	14%
No	55%	49%	64%	48%	51%	66%	48%	52%	64%
Prefer not to say	1%	1%	1%	1%	2%	1%	1%	1%	1%
Unweighted N	(1,500)	(802)	(599)	(607)	(427)	(466)	(484)	(489)	(484)

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47. People I Know – Has Tested Positive for COVID-19

Do you personally know anyone who... [has tested positive for covid-19]? Check all that apply.

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Yes, me	4%	4%	5%	4%	2%	4%	3%	5%	9%
Yes, a family member	22%	19%	24%	19%	18%	19%	24%	26%	28%
Yes, a close friend	33%	32%	34%	30%	43%	30%	42%	20%	29%
No	48%	51%	45%	55%	43%	54%	38%	50%	38%
Prefer not to say	2%	1%	2%	1%	1%	1%	1%	4%	4%
Unweighted N	(1,500)	(683)	(817)	(324)	(209)	(384)	(235)	(150)	(111)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Yes, me	4%	9%	8%	3%	2%	5%	2%	7%	4%	2%	5%	5%
Yes, a family member	22%	26%	26%	20%	19%	21%	22%	26%	20%	24%	21%	24%
Yes, a close friend	33%	37%	32%	31%	35%	31%	31%	41%	32%	39%	31%	32%
No	48%	45%	42%	53%	47%	50%	49%	39%	53%	45%	48%	47%
Prefer not to say	2%	2%	4%	1%	0%	3%	0%	1%	0%	1%	3%	1%
Unweighted N	(1,500)	(191)	(307)	(613)	(389)	(522)	(439)	(373)	(244)	(373)	(498)	(385)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Yes, me	4%	4%	4%	6%	3%	4%	7%	5%	2%
Yes, a family member	22%	25%	18%	23%	23%	20%	22%	23%	20%
Yes, a close friend	33%	35%	32%	32%	35%	33%	36%	31%	34%
No	48%	45%	52%	46%	47%	51%	42%	49%	51%
Prefer not to say	2%	1%	1%	1%	3%	1%	2%	1%	1%
Unweighted N	(1,500)	(802)	(599)	(607)	(427)	(466)	(484)	(489)	(484)

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48. People I Know – Has Died Due to Complications from COVID-19

Do you personally know anyone who... [has died due to complications from covid-19]? Check all that apply.

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Yes, a family member	8%	7%	8%	5%	7%	3%	8%	16%	14%
Yes, a close friend	13%	10%	15%	10%	8%	9%	15%	19%	21%
No	79%	83%	76%	85%	87%	87%	75%	61%	69%
Prefer not to say	2%	2%	2%	1%	1%	1%	2%	6%	3%
Unweighted N	(1,500)	(683)	(817)	(324)	(209)	(384)	(235)	(150)	(111)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Yes, a family member	8%	5%	16%	6%	5%	7%	9%	9%	9%	5%	9%	7%
Yes, a close friend	13%	9%	15%	13%	13%	13%	11%	16%	16%	11%	12%	13%
No	79%	85%	71%	80%	81%	79%	80%	78%	75%	84%	77%	81%
Prefer not to say	2%	2%	2%	2%	3%	2%	2%	1%	1%	1%	4%	0%
Unweighted N	(1,500)	(191)	(307)	(613)	(389)	(522)	(439)	(373)	(244)	(373)	(498)	(385)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Yes, a family member	8%	7%	7%	7%	9%	7%	8%	9%	6%
Yes, a close friend	13%	16%	11%	17%	11%	9%	14%	15%	10%
No	79%	76%	83%	74%	79%	85%	77%	76%	84%
Prefer not to say	2%	2%	1%	3%	2%	1%	2%	2%	1%
Unweighted N	(1,500)	(802)	(599)	(607)	(427)	(466)	(484)	(489)	(484)

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49. Personal Worry about COVID-19

Taking into consideration both your risk of contracting it and the seriousness of the illness, how worried are you personally about experiencing COVID-19?

		Gender		White Men		White Women		Race	
	Total	Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Very worried	23%	19%	26%	13%	21%	26%	23%	26%	31%
Somewhat worried	36%	35%	37%	31%	40%	33%	40%	45%	42%
Not too worried	23%	26%	21%	31%	25%	22%	27%	14%	12%
Not worried at all	18%	20%	16%	24%	14%	19%	10%	15%	16%
Totals	100%	100%	100%	99%	100%	100%	100%	100%	101%
Unweighted N	(1,498)	(683)	(815)	(324)	(209)	(384)	(234)	(150)	(111)

		Age				Income			Region			
	Total	18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Very worried	23%	15%	23%	26%	22%	25%	19%	24%	26%	20%	23%	21%
Somewhat worried	36%	39%	36%	35%	37%	35%	41%	39%	39%	30%	38%	39%
Not too worried	23%	26%	21%	21%	26%	23%	23%	21%	23%	28%	22%	20%
Not worried at all	18%	20%	20%	18%	15%	17%	17%	16%	13%	22%	17%	20%
Totals	100%	100%	100%	100%	100%	100%	100%	100%	101%	100%	100%	100%
Unweighted N	(1,498)	(191)	(307)	(611)	(389)	(521)	(439)	(372)	(244)	(372)	(498)	(384)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Very worried	23%	39%	7%	35%	22%	9%	39%	25%	8%
Somewhat worried	36%	46%	26%	46%	34%	28%	47%	36%	27%
Not too worried	23%	12%	33%	13%	22%	35%	10%	22%	35%
Not worried at all	18%	3%	34%	5%	22%	28%	4%	16%	30%
Totals	100%	100%	100%	99%	100%	100%	100%	99%	100%
Unweighted N	(1,498)	(802)	(597)	(607)	(427)	(464)	(484)	(488)	(483)

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50. Frequency of Wearing a Facemask

In the past seven days, how often have you worn a mask on your face when outside your home?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Always	56%	48%	63%	37%	51%	58%	64%	78%	63%
Most of the time	23%	24%	21%	24%	31%	21%	27%	15%	18%
Some of the time	15%	20%	10%	26%	17%	13%	7%	5%	13%
Never	6%	8%	5%	13%	2%	8%	3%	2%	6%
Totals	100%	100%	99%	100%	101%	100%	101%	100%	100%
Unweighted N	(1,495)	(681)	(814)	(323)	(209)	(382)	(234)	(150)	(111)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Always	56%	46%	52%	59%	62%	56%	57%	58%	65%	52%	53%	59%
Most of the time	23%	26%	28%	21%	20%	20%	26%	25%	22%	24%	24%	20%
Some of the time	15%	18%	12%	15%	15%	16%	14%	14%	7%	17%	16%	16%
Never	6%	10%	8%	6%	3%	8%	3%	3%	6%	6%	7%	5%
Totals	100%	100%	100%	101%	100%	100%	100%	100%	100%	99%	100%	100%
Unweighted N	(1,495)	(190)	(305)	(612)	(388)	(521)	(436)	(372)	(243)	(372)	(496)	(384)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Always	56%	79%	37%	77%	48%	39%	77%	57%	38%
Most of the time	23%	17%	27%	17%	26%	27%	17%	23%	28%
Some of the time	15%	3%	25%	4%	19%	23%	5%	15%	23%
Never	6%	1%	12%	1%	7%	10%	1%	5%	11%
Totals	100%	100%	101%	99%	100%	99%	100%	100%	100%
Unweighted N	(1,495)	(800)	(597)	(605)	(426)	(464)	(483)	(486)	(483)

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51. Local Cases Increasing or Decreasing

Do you think the number of cases of COVID-19 in the community where you live is...

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Increasing	53%	54%	53%	51%	59%	47%	64%	52%	51%
Not changing	22%	23%	22%	25%	23%	23%	17%	17%	26%
Decreasing	11%	12%	11%	10%	12%	15%	7%	8%	10%
Not sure	13%	12%	14%	14%	6%	15%	12%	24%	13%
Totals	99%	101%	100%	100%	100%	100%	100%	101%	100%
Unweighted N	(1,500)	(683)	(817)	(324)	(209)	(384)	(235)	(150)	(111)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Increasing	53%	53%	54%	55%	49%	47%	55%	61%	55%	66%	46%	50%
Not changing	22%	23%	21%	18%	27%	27%	21%	18%	18%	16%	24%	28%
Decreasing	11%	11%	11%	14%	9%	11%	12%	10%	12%	7%	13%	12%
Not sure	13%	13%	13%	13%	15%	14%	11%	11%	15%	10%	17%	10%
Totals	99%	100%	99%	100%	100%	99%	99%	100%	100%	99%	100%	100%
Unweighted N	(1,500)	(191)	(307)	(613)	(389)	(522)	(439)	(373)	(244)	(373)	(498)	(385)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Increasing	53%	76%	35%	71%	47%	37%	77%	51%	36%
Not changing	22%	12%	29%	13%	26%	28%	11%	25%	28%
Decreasing	11%	4%	18%	5%	13%	17%	4%	11%	18%
Not sure	13%	8%	18%	10%	13%	17%	8%	12%	17%
Totals	99%	100%	100%	99%	99%	99%	100%	99%	99%
Unweighted N	(1,500)	(802)	(599)	(607)	(427)	(466)	(484)	(489)	(484)

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52. Where in the Pandemic We Currently Are

Looking at the COVID-19 pandemic in the U.S., do you believe that...

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
The pandemic is going to get worse	47%	46%	49%	39%	52%	43%	52%	65%	44%
We are currently in the worst part of the pandemic	18%	17%	18%	13%	17%	15%	18%	18%	31%
The worst part of the pandemic is behind us	21%	26%	18%	32%	23%	25%	15%	4%	17%
Not sure	14%	11%	15%	16%	8%	17%	15%	13%	7%
Totals	100%	100%	100%	100%	100%	100%	100%	100%	99%
Unweighted N	(1,498)	(682)	(816)	(324)	(209)	(384)	(234)	(149)	(111)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
The pandemic is going to get worse	47%	42%	41%	52%	49%	48%	46%	52%	52%	51%	44%	46%
We are currently in the worst part of the pandemic	18%	28%	20%	14%	16%	20%	18%	16%	13%	19%	17%	21%
The worst part of the pandemic is behind us	21%	17%	26%	21%	21%	18%	20%	24%	17%	21%	24%	22%
Not sure	14%	13%	13%	13%	15%	14%	16%	8%	18%	10%	15%	12%
Totals	100%	100%	100%	100%	101%	100%	100%	100%	100%	101%	100%	101%
Unweighted N	(1,498)	(191)	(306)	(612)	(389)	(522)	(438)	(372)	(243)	(372)	(498)	(385)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
The pandemic is going to get worse	47%	76%	22%	72%	40%	26%	73%	49%	25%
We are currently in the worst part of the pandemic	18%	17%	15%	18%	16%	19%	17%	19%	17%
The worst part of the pandemic is behind us	21%	2%	42%	3%	28%	37%	4%	20%	38%
Not sure	14%	5%	20%	7%	16%	19%	6%	12%	20%
Totals	100%	100%	99%	100%	100%	101%	100%	100%	100%
Unweighted N	(1,498)	(802)	(598)	(606)	(427)	(465)	(484)	(488)	(483)

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53. Estimated Total Number of COVID-19 Deaths

How many Americans, in total, do you think will have died this year due to complications from COVID-19?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Fewer than 100,000 Americans	14%	13%	15%	16%	10%	19%	9%	9%	14%
100,000-150,000 Americans	11%	10%	13%	11%	7%	17%	8%	12%	11%
150,000-200,000 Americans	10%	9%	11%	10%	9%	11%	8%	13%	9%
200,000-250,000 Americans	33%	41%	27%	40%	46%	25%	31%	29%	28%
250,000-1 million Americans	27%	24%	29%	20%	27%	22%	39%	26%	31%
More than 1 million Americans	5%	3%	6%	3%	1%	4%	5%	11%	7%
Totals	100%	100%	101%	100%	100%	98%	100%	100%	100%
Unweighted N	(1,488)	(680)	(808)	(324)	(208)	(380)	(233)	(148)	(110)

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	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Fewer than 100,000 Americans	14%	11%	20%	12%	13%	18%	12%	9%	16%	13%	15%	13%
100,000-150,000 Americans	11%	19%	12%	10%	8%	16%	10%	7%	7%	13%	10%	14%
150,000-200,000 Americans	10%	11%	8%	9%	13%	14%	10%	6%	8%	10%	11%	10%
200,000-250,000 Americans	33%	26%	25%	36%	41%	25%	37%	40%	32%	33%	35%	31%
250,000-1 million Americans	27%	29%	26%	29%	23%	21%	27%	35%	33%	28%	23%	26%
More than 1 million Americans	5%	5%	8%	4%	2%	6%	4%	3%	4%	3%	5%	5%
Totals	100%	101%	99%	100%	100%	100%	100%	100%	100%	100%	99%	99%
Unweighted N	(1,488)	(191)	(303)	(609)	(385)	(517)	(434)	(373)	(242)	(370)	(494)	(382)

The Economist/YouGov Poll
November 8 - 10, 2020 - 1500 U.S. Registered Voters



	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Fewer than 100,000 Americans	14%	3%	27%	4%	18%	22%	3%	13%	24%
100,000-150,000 Americans	11%	5%	12%	6%	14%	15%	6%	13%	15%
150,000-200,000 Americans	10%	7%	13%	9%	10%	12%	6%	10%	13%
200,000-250,000 Americans	33%	34%	38%	33%	30%	36%	32%	32%	36%
250,000-1 million Americans	27%	44%	9%	41%	25%	12%	50%	25%	11%
More than 1 million Americans	5%	7%	2%	8%	3%	3%	3%	6%	3%
Totals	100%	100%	101%	101%	100%	100%	100%	99%	102%
Unweighted N	(1,488)	(798)	(591)	(604)	(423)	(461)	(482)	(484)	(479)

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54. Length of Social Distancing

When do you think it will be safe to end social distancing measures and reopen businesses as normal?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
It is safe right now	20%	23%	18%	32%	17%	22%	14%	6%	17%
In about two weeks	2%	2%	3%	1%	2%	1%	1%	4%	7%
In a month or so	5%	7%	3%	6%	4%	2%	2%	6%	12%
In several months	21%	24%	18%	20%	33%	16%	21%	17%	21%
In about a year or longer	33%	29%	37%	24%	32%	35%	34%	52%	29%
Not sure	19%	15%	22%	17%	12%	23%	28%	14%	15%
Totals	100%	100%	101%	100%	100%	99%	100%	99%	101%
Unweighted N	(1,498)	(682)	(816)	(323)	(209)	(383)	(235)	(150)	(111)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
It is safe right now	20%	24%	25%	20%	15%	18%	20%	21%	15%	23%	20%	22%
In about two weeks	2%	3%	6%	1%	0%	3%	2%	2%	2%	1%	1%	6%
In a month or so	5%	13%	8%	1%	4%	7%	4%	3%	3%	4%	6%	6%
In several months	21%	25%	18%	21%	21%	17%	23%	24%	21%	20%	21%	22%
In about a year or longer	33%	22%	29%	39%	34%	35%	31%	37%	39%	33%	33%	30%
Not sure	19%	13%	15%	19%	24%	19%	21%	13%	21%	19%	20%	14%
Totals	100%	100%	101%	101%	98%	99%	101%	100%	101%	100%	101%	100%
Unweighted N	(1,498)	(191)	(305)	(613)	(389)	(521)	(439)	(373)	(244)	(373)	(497)	(384)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
It is safe right now	20%	2%	41%	4%	25%	35%	4%	19%	36%
In about two weeks	2%	1%	2%	3%	1%	3%	2%	2%	3%
In a month or so	5%	2%	6%	4%	6%	5%	4%	5%	5%
In several months	21%	24%	19%	19%	22%	21%	20%	23%	19%
In about a year or longer	33%	55%	12%	55%	25%	15%	54%	36%	15%
Not sure	19%	16%	21%	15%	20%	21%	16%	16%	22%
Totals	100%	100%	101%	100%	99%	100%	100%	101%	100%
Unweighted N	(1,498)	(802)	(597)	(606)	(427)	(465)	(483)	(488)	(484)

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55. Get Vaccinated

If and when a coronavirus vaccine becomes available, will you get vaccinated?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Yes	42%	48%	37%	43%	62%	33%	54%	22%	38%
No	27%	24%	30%	31%	14%	32%	15%	37%	26%
Not sure	31%	28%	34%	26%	24%	34%	31%	41%	35%
Totals	100%	100%	101%	100%	100%	99%	100%	100%	99%
Unweighted N	(1,498)	(682)	(816)	(324)	(209)	(384)	(235)	(149)	(110)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Yes	42%	34%	42%	43%	46%	33%	44%	57%	41%	39%	46%	40%
No	27%	34%	37%	24%	19%	34%	26%	16%	18%	33%	27%	27%
Not sure	31%	32%	21%	34%	35%	33%	30%	27%	41%	28%	28%	33%
Totals	100%	100%	100%	101%	100%	100%	100%	100%	100%	100%	101%	100%
Unweighted N	(1,498)	(190)	(306)	(613)	(389)	(520)	(439)	(373)	(244)	(373)	(496)	(385)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Yes	42%	52%	37%	48%	36%	41%	58%	37%	37%
No	27%	14%	37%	18%	31%	33%	14%	25%	36%
Not sure	31%	34%	27%	34%	33%	26%	27%	38%	28%
Totals	100%	100%	101%	100%	100%	100%	99%	100%	101%
Unweighted N	(1,498)	(802)	(599)	(607)	(425)	(466)	(483)	(489)	(484)

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56. Time Before Vaccine Is Ready

How long do you think it will be before a vaccine for COVID-19 is available to the public?

		Gender		White Men		White Women		Race	
	Total	Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Before the end of the summer	0%	0%	0%	0%	0%	0%	0%	0%	0%
Before November	1%	0%	1%	0%	0%	1%	1%	2%	2%
By the end of 2020	19%	23%	15%	30%	20%	15%	10%	9%	22%
By the summer of 2021	43%	43%	43%	40%	52%	40%	51%	39%	38%
By the end of 2021	17%	15%	18%	11%	16%	17%	23%	19%	15%
2022 or later	5%	4%	5%	4%	2%	5%	4%	11%	5%
Not sure	16%	14%	17%	14%	10%	21%	12%	20%	19%
Totals	101%	99%	99%	99%	100%	99%	101%	100%	101%
Unweighted N	(1,499)	(683)	(816)	(324)	(209)	(384)	(235)	(150)	(110)

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	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Before the end of the summer	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Before November	1%	2%	1%	0%	1%	2%	0%	1%	0%	0%	1%	1%
By the end of 2020	19%	17%	21%	17%	20%	20%	15%	20%	15%	19%	19%	20%
By the summer of 2021	43%	43%	38%	46%	43%	34%	50%	53%	50%	42%	41%	42%
By the end of 2021	17%	22%	14%	17%	16%	19%	17%	15%	13%	22%	15%	19%
2022 or later	5%	3%	7%	4%	4%	6%	5%	2%	5%	4%	5%	4%
Not sure	16%	13%	18%	15%	16%	20%	14%	9%	16%	13%	18%	14%
Totals	101%	100%	99%	99%	100%	101%	101%	100%	99%	100%	99%	100%
Unweighted N	(1,499)	(191)	(306)	(613)	(389)	(521)	(439)	(373)	(244)	(373)	(497)	(385)

	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Before the end of the summer	0%	0%	0%	0%	0%	0%	0%	0%	0%
Before November	1%	0%	1%	1%	0%	1%	1%	1%	1%
By the end of 2020	19%	7%	32%	7%	21%	30%	8%	14%	32%
By the summer of 2021	43%	53%	33%	50%	40%	38%	50%	50%	33%
By the end of 2021	17%	24%	10%	26%	14%	10%	27%	16%	10%
2022 or later	5%	6%	5%	6%	5%	4%	4%	6%	3%
Not sure	16%	11%	20%	11%	20%	18%	10%	13%	21%
Totals	101%	101%	101%	101%	100%	101%	100%	100%	100%
Unweighted N	(1,499)	(802)	(599)	(606)	(427)	(466)	(483)	(489)	(484)

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57. Safety of Fast Tracked Vaccine

Coronavirus vaccines are being fast-tracked through the approval process. How concerned are you about the safety of coronavirus vaccines?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Very concerned	36%	28%	43%	29%	19%	42%	30%	56%	49%
Somewhat concerned	35%	37%	33%	34%	42%	32%	47%	25%	31%
Not very concerned	14%	17%	11%	19%	22%	12%	15%	8%	6%
Not concerned at all	9%	13%	7%	15%	14%	8%	5%	5%	9%
Not sure	5%	4%	6%	4%	3%	7%	3%	6%	5%
Totals	99%	99%	100%	101%	100%	101%	100%	100%	100%
Unweighted N	(1,497)	(683)	(814)	(324)	(209)	(383)	(235)	(149)	(110)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Very concerned	36%	38%	40%	34%	35%	45%	33%	27%	36%	39%	34%	37%
Somewhat concerned	35%	39%	32%	35%	35%	31%	38%	41%	36%	33%	35%	36%
Not very concerned	14%	11%	12%	15%	17%	11%	15%	19%	14%	15%	14%	13%
Not concerned at all	9%	6%	8%	11%	10%	7%	9%	10%	9%	8%	10%	9%
Not sure	5%	6%	8%	5%	3%	6%	5%	3%	5%	5%	6%	4%
Totals	99%	100%	100%	100%	100%	100%	100%	100%	100%	100%	99%	99%
Unweighted N	(1,497)	(191)	(306)	(612)	(388)	(521)	(439)	(372)	(243)	(373)	(497)	(384)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Very concerned	36%	42%	30%	45%	31%	31%	41%	40%	30%
Somewhat concerned	35%	42%	26%	39%	37%	29%	43%	40%	26%
Not very concerned	14%	10%	20%	9%	13%	21%	10%	10%	21%
Not concerned at all	9%	3%	18%	4%	10%	15%	4%	7%	16%
Not sure	5%	3%	6%	3%	8%	5%	3%	3%	7%
Totals	99%	100%	100%	100%	99%	101%	101%	100%	100%
Unweighted N	(1,497)	(800)	(598)	(605)	(426)	(466)	(483)	(488)	(483)

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58. Trump Job Approval on COVID-19

Do you approve or disapprove of the way Donald Trump has handled COVID-19?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Strongly approve	28%	28%	28%	35%	30%	40%	24%	7%	17%
Somewhat approve	16%	18%	14%	26%	13%	13%	19%	7%	17%
Somewhat disapprove	7%	8%	5%	6%	9%	6%	3%	9%	6%
Strongly disapprove	47%	43%	50%	29%	46%	37%	52%	72%	57%
Not sure	3%	3%	3%	3%	2%	3%	2%	4%	3%
Totals	101%	100%	100%	99%	100%	99%	100%	99%	100%
Unweighted N	(1,499)	(683)	(816)	(324)	(209)	(384)	(235)	(150)	(110)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Strongly approve	28%	12%	22%	31%	36%	27%	25%	29%	22%	30%	31%	26%
Somewhat approve	16%	24%	22%	11%	14%	17%	17%	13%	12%	17%	20%	12%
Somewhat disapprove	7%	13%	5%	6%	4%	7%	8%	4%	8%	8%	4%	8%
Strongly disapprove	47%	48%	43%	49%	45%	45%	46%	53%	54%	43%	42%	52%
Not sure	3%	2%	8%	1%	1%	3%	4%	1%	3%	3%	3%	2%
Totals	101%	99%	100%	98%	100%	99%	100%	100%	99%	101%	100%	100%
Unweighted N	(1,499)	(191)	(306)	(613)	(389)	(521)	(439)	(373)	(244)	(373)	(497)	(385)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Strongly approve	28%	1%	62%	2%	26%	59%	2%	17%	59%
Somewhat approve	16%	2%	26%	5%	18%	27%	3%	20%	24%
Somewhat disapprove	7%	4%	7%	4%	10%	6%	3%	10%	6%
Strongly disapprove	47%	91%	3%	87%	40%	6%	92%	50%	8%
Not sure	3%	1%	2%	1%	6%	2%	1%	3%	2%
Totals	101%	99%	100%	99%	100%	100%	101%	100%	99%
Unweighted N	(1,499)	(802)	(599)	(607)	(426)	(466)	(483)	(489)	(484)

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59. Mask Mandate a Violation of Civil Liberties

Do you believe that a federal mask mandate would be a violation of your civil liberties, or not?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
It would be a violation of civil liberties	35%	41%	31%	52%	39%	39%	29%	10%	31%
It would not be a violation of civil liberties	57%	52%	61%	42%	55%	54%	66%	75%	60%
Don't know	7%	7%	8%	6%	6%	7%	5%	16%	9%
Totals	99%	100%	100%	100%	100%	100%	100%	101%	100%
Unweighted N	(1,495)	(682)	(813)	(324)	(209)	(384)	(234)	(147)	(110)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
It would be a violation of civil liberties	35%	30%	36%	34%	40%	33%	35%	37%	29%	37%	39%	33%
It would not be a violation of civil liberties	57%	59%	55%	60%	54%	57%	58%	59%	63%	57%	52%	60%
Don't know	7%	11%	8%	7%	5%	11%	7%	4%	8%	6%	9%	6%
Totals	99%	100%	99%	101%	99%	101%	100%	100%	100%	100%	100%	99%
Unweighted N	(1,495)	(191)	(304)	(613)	(387)	(519)	(438)	(372)	(244)	(373)	(494)	(384)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
It would be a violation of civil liberties	35%	5%	70%	7%	38%	65%	9%	27%	66%
It would not be a violation of civil liberties	57%	91%	22%	88%	53%	27%	89%	65%	26%
Don't know	7%	4%	8%	5%	10%	8%	2%	8%	8%
Totals	99%	100%	100%	100%	101%	100%	100%	100%	100%
Unweighted N	(1,495)	(797)	(599)	(602)	(427)	(466)	(482)	(487)	(483)

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60A. Issue Importance — Jobs and the economy

How important are the following issues to you?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Very Important	77%	77%	77%	78%	75%	78%	73%	83%	75%
Somewhat Important	21%	21%	21%	21%	24%	21%	25%	12%	21%
Not very Important	2%	2%	2%	1%	0%	1%	1%	5%	2%
Unimportant	1%	0%	1%	0%	1%	0%	2%	0%	2%
Totals	101%	100%	101%	100%	100%	100%	101%	100%	100%
Unweighted N	(1,496)	(680)	(816)	(324)	(208)	(384)	(235)	(149)	(109)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Very Important	77%	64%	73%	83%	78%	75%	76%	77%	74%	75%	82%	72%
Somewhat Important	21%	30%	22%	17%	21%	22%	21%	22%	21%	24%	17%	23%
Not very Important	2%	5%	3%	1%	1%	2%	1%	1%	3%	0%	1%	3%
Unimportant	1%	1%	2%	0%	0%	1%	1%	0%	1%	0%	0%	1%
Totals	101%	100%	100%	101%	100%	100%	99%	100%	99%	99%	100%	99%
Unweighted N	(1,496)	(189)	(306)	(613)	(388)	(519)	(439)	(372)	(244)	(371)	(497)	(384)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Very Important	77%	75%	82%	75%	76%	80%	69%	78%	83%
Somewhat Important	21%	22%	17%	22%	23%	19%	28%	20%	16%
Not very Important	2%	2%	1%	3%	1%	1%	2%	2%	1%
Unimportant	1%	0%	0%	0%	1%	1%	1%	0%	0%
Totals	101%	99%	100%	100%	101%	101%	100%	100%	100%
Unweighted N	(1,496)	(798)	(599)	(603)	(427)	(466)	(481)	(489)	(483)

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60B. Issue Importance — Immigration

How important are the following issues to you?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Very Important	49%	49%	48%	53%	46%	56%	42%	39%	55%
Somewhat Important	36%	33%	38%	28%	42%	34%	42%	40%	30%
Not very Important	12%	14%	10%	13%	12%	8%	12%	15%	12%
Unimportant	3%	3%	3%	5%	0%	2%	3%	5%	3%
Totals	100%	99%	99%	99%	100%	100%	99%	99%	100%
Unweighted N	(1,496)	(681)	(815)	(324)	(209)	(383)	(235)	(149)	(109)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Very Important	49%	45%	42%	48%	57%	50%	44%	48%	45%	48%	52%	49%
Somewhat Important	36%	36%	35%	38%	34%	36%	36%	42%	39%	35%	37%	33%
Not very Important	12%	12%	17%	12%	8%	10%	17%	9%	14%	14%	8%	15%
Unimportant	3%	7%	6%	2%	1%	5%	3%	1%	2%	3%	3%	4%
Totals	100%	100%	100%	100%	100%	101%	100%	100%	100%	100%	100%	101%
Unweighted N	(1,496)	(189)	(306)	(613)	(388)	(518)	(439)	(373)	(244)	(371)	(497)	(384)

The Economist/YouGov Poll
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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Very Important	49%	38%	67%	42%	40%	64%	42%	39%	65%
Somewhat Important	36%	45%	25%	43%	38%	27%	41%	44%	26%
Not very Important	12%	16%	6%	13%	18%	5%	15%	16%	6%
Unimportant	3%	2%	3%	2%	4%	4%	3%	2%	3%
Totals	100%	101%	101%	100%	100%	100%	101%	101%	100%
Unweighted N	(1,496)	(798)	(599)	(603)	(427)	(466)	(481)	(489)	(483)

The Economist/YouGov Poll
November 8 - 10, 2020 - 1500 U.S. Registered Voters



60C. Issue Importance — Climate change and the environment

How important are the following issues to you?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Very Important	42%	37%	47%	23%	43%	38%	50%	58%	57%
Somewhat Important	24%	23%	25%	28%	15%	28%	23%	25%	20%
Not very Important	18%	20%	16%	25%	16%	20%	14%	14%	16%
Unimportant	16%	20%	12%	24%	25%	14%	14%	3%	8%
Totals	100%	100%	100%	100%	99%	100%	101%	100%	101%
Unweighted N	(1,497)	(681)	(816)	(324)	(209)	(384)	(235)	(149)	(109)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Very Important	42%	49%	44%	42%	37%	41%	41%	48%	52%	41%	37%	45%
Somewhat Important	24%	23%	29%	22%	24%	29%	24%	20%	20%	23%	26%	25%
Not very Important	18%	15%	16%	19%	21%	19%	22%	13%	14%	22%	18%	18%
Unimportant	16%	13%	11%	17%	18%	12%	13%	19%	13%	15%	19%	13%
Totals	100%	100%	100%	100%	100%	101%	100%	100%	99%	101%	100%	101%
Unweighted N	(1,497)	(189)	(306)	(613)	(389)	(519)	(439)	(373)	(244)	(372)	(497)	(384)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Very Important	42%	76%	9%	74%	36%	12%	82%	45%	10%
Somewhat Important	24%	18%	24%	18%	27%	28%	13%	32%	24%
Not very Important	18%	5%	32%	6%	20%	30%	4%	15%	32%
Unimportant	16%	1%	35%	1%	17%	30%	1%	9%	33%
Totals	100%	100%	100%	99%	100%	100%	100%	101%	99%
Unweighted N	(1,497)	(799)	(599)	(604)	(427)	(466)	(482)	(489)	(483)

The Economist/YouGov Poll
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60D. Issue Importance — National Security and foreign policy

How important are the following issues to you?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Very Important	61%	62%	60%	65%	57%	66%	55%	55%	64%
Somewhat Important	31%	29%	33%	25%	38%	29%	36%	36%	26%
Not very Important	7%	8%	6%	8%	5%	3%	7%	8%	11%
Unimportant	1%	2%	1%	2%	0%	1%	2%	1%	0%
Totals	100%	101%	100%	100%	100%	99%	100%	100%	101%
Unweighted N	(1,497)	(681)	(816)	(324)	(209)	(384)	(235)	(149)	(109)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Very Important	61%	42%	54%	64%	72%	57%	61%	60%	59%	57%	66%	57%
Somewhat Important	31%	40%	31%	33%	25%	34%	31%	34%	32%	33%	29%	32%
Not very Important	7%	14%	12%	3%	3%	7%	5%	5%	7%	9%	3%	10%
Unimportant	1%	4%	3%	0%	0%	2%	2%	0%	1%	2%	1%	1%
Totals	100%	100%	100%	100%	100%	100%	99%	99%	99%	101%	99%	100%
Unweighted N	(1,497)	(189)	(306)	(613)	(389)	(519)	(439)	(373)	(244)	(372)	(497)	(384)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Very Important	61%	52%	74%	54%	58%	71%	53%	58%	73%
Somewhat Important	31%	41%	22%	39%	30%	24%	39%	32%	24%
Not very Important	7%	7%	3%	7%	9%	4%	8%	8%	3%
Unimportant	1%	0%	1%	1%	2%	1%	1%	2%	1%
Totals	100%	100%	100%	101%	99%	100%	101%	100%	101%
Unweighted N	(1,497)	(799)	(599)	(604)	(427)	(466)	(482)	(489)	(483)

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60E. Issue Importance — Education

How important are the following issues to you?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Very Important	59%	55%	63%	47%	52%	60%	62%	71%	68%
Somewhat Important	30%	33%	28%	39%	36%	29%	27%	21%	25%
Not very Important	8%	10%	7%	11%	11%	8%	8%	6%	8%
Unimportant	2%	2%	2%	3%	2%	3%	3%	1%	0%
Totals	99%	100%	100%	100%	101%	100%	100%	99%	101%
Unweighted N	(1,495)	(680)	(815)	(323)	(209)	(384)	(235)	(149)	(108)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Very Important	59%	62%	62%	57%	59%	62%	58%	58%	53%	61%	62%	58%
Somewhat Important	30%	27%	28%	31%	32%	28%	31%	31%	33%	30%	28%	31%
Not very Important	8%	6%	8%	10%	8%	8%	9%	9%	11%	7%	8%	8%
Unimportant	2%	5%	2%	2%	1%	2%	2%	2%	3%	1%	2%	3%
Totals	99%	100%	100%	100%	100%	100%	100%	100%	100%	99%	100%	100%
Unweighted N	(1,495)	(189)	(304)	(613)	(389)	(517)	(439)	(373)	(244)	(372)	(495)	(384)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Very Important	59%	71%	50%	71%	56%	49%	73%	59%	50%
Somewhat Important	30%	25%	37%	24%	30%	37%	23%	31%	35%
Not very Important	8%	3%	11%	4%	11%	10%	3%	9%	12%
Unimportant	2%	1%	3%	0%	2%	4%	1%	2%	3%
Totals	99%	100%	101%	99%	99%	100%	100%	101%	100%
Unweighted N	(1,495)	(799)	(598)	(602)	(427)	(466)	(481)	(488)	(483)

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60F. Issue Importance — Health care

How important are the following issues to you?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Very Important	68%	60%	75%	55%	60%	74%	73%	84%	72%
Somewhat Important	23%	28%	19%	35%	28%	22%	20%	9%	16%
Not very Important	7%	10%	4%	9%	11%	4%	6%	4%	7%
Unimportant	1%	2%	1%	1%	1%	0%	0%	3%	4%
Totals	99%	100%	99%	100%	100%	100%	99%	100%	99%
Unweighted N	(1,497)	(681)	(816)	(324)	(209)	(384)	(235)	(149)	(109)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Very Important	68%	60%	63%	74%	69%	73%	68%	64%	73%	66%	67%	68%
Somewhat Important	23%	24%	25%	19%	27%	22%	23%	25%	19%	27%	24%	23%
Not very Important	7%	13%	9%	6%	4%	4%	7%	9%	7%	6%	8%	7%
Unimportant	1%	3%	3%	1%	0%	1%	2%	1%	2%	1%	1%	2%
Totals	99%	100%	100%	100%	100%	100%	100%	99%	101%	100%	100%	100%
Unweighted N	(1,497)	(189)	(306)	(613)	(389)	(519)	(439)	(373)	(244)	(372)	(497)	(384)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Very Important	68%	91%	47%	89%	58%	53%	88%	68%	52%
Somewhat Important	23%	8%	41%	8%	28%	37%	10%	22%	36%
Not very Important	7%	1%	10%	1%	13%	9%	1%	7%	10%
Unimportant	1%	1%	2%	1%	1%	2%	1%	2%	1%
Totals	99%	101%	100%	99%	100%	101%	100%	99%	99%
Unweighted N	(1,497)	(799)	(599)	(604)	(427)	(466)	(482)	(489)	(483)

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60G. Issue Importance — Taxes and government spending

How important are the following issues to you?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Very Important	63%	62%	63%	60%	61%	69%	55%	63%	72%
Somewhat Important	30%	31%	29%	32%	34%	28%	34%	30%	19%
Not very Important	6%	6%	6%	7%	5%	3%	11%	5%	7%
Unimportant	1%	1%	1%	1%	0%	0%	0%	2%	2%
Totals	100%	100%	99%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,497)	(681)	(816)	(324)	(209)	(384)	(235)	(149)	(109)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Very Important	63%	47%	55%	67%	72%	60%	62%	66%	57%	61%	67%	62%
Somewhat Important	30%	39%	31%	29%	26%	31%	32%	27%	32%	32%	28%	30%
Not very Important	6%	14%	11%	4%	2%	7%	5%	7%	11%	6%	4%	6%
Unimportant	1%	1%	3%	0%	0%	1%	0%	0%	0%	0%	1%	2%
Totals	100%	101%	100%	100%	100%	99%	99%	100%	100%	99%	100%	100%
Unweighted N	(1,497)	(189)	(306)	(613)	(389)	(519)	(439)	(373)	(244)	(372)	(497)	(384)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Very Important	63%	49%	80%	52%	62%	76%	43%	63%	79%
Somewhat Important	30%	41%	17%	38%	29%	22%	43%	31%	19%
Not very Important	6%	10%	2%	9%	8%	2%	13%	5%	2%
Unimportant	1%	1%	0%	1%	0%	1%	1%	1%	0%
Totals	100%	101%	99%	100%	99%	101%	100%	100%	100%
Unweighted N	(1,497)	(799)	(599)	(604)	(427)	(466)	(482)	(489)	(483)

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60H. Issue Importance — Civil rights and civil liberties

How important are the following issues to you?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Very Important	62%	57%	67%	53%	54%	64%	60%	81%	69%
Somewhat Important	26%	28%	25%	31%	32%	29%	28%	12%	20%
Not very Important	9%	12%	6%	12%	12%	5%	9%	6%	8%
Unimportant	3%	3%	2%	4%	2%	3%	2%	1%	3%
Totals	100%	100%	100%	100%	100%	101%	99%	100%	100%
Unweighted N	(1,496)	(680)	(816)	(324)	(208)	(384)	(235)	(149)	(109)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Very Important	62%	61%	64%	63%	60%	65%	57%	64%	63%	56%	66%	61%
Somewhat Important	26%	23%	26%	27%	28%	23%	32%	25%	29%	30%	23%	26%
Not very Important	9%	15%	7%	7%	9%	9%	10%	7%	7%	11%	7%	11%
Unimportant	3%	0%	3%	3%	2%	3%	1%	3%	1%	3%	4%	2%
Totals	100%	99%	100%	100%	99%	100%	100%	99%	100%	100%	100%	100%
Unweighted N	(1,496)	(189)	(306)	(613)	(388)	(519)	(439)	(372)	(244)	(371)	(497)	(384)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Very Important	62%	78%	47%	79%	59%	46%	82%	61%	50%
Somewhat Important	26%	18%	35%	18%	25%	37%	16%	28%	33%
Not very Important	9%	3%	13%	2%	15%	11%	1%	9%	13%
Unimportant	3%	0%	5%	1%	1%	6%	1%	2%	4%
Totals	100%	99%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,496)	(798)	(599)	(603)	(427)	(466)	(481)	(489)	(483)

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60I. Issue Importance — Gun control

How important are the following issues to you?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Very Important	48%	42%	54%	38%	41%	50%	47%	63%	62%
Somewhat Important	23%	21%	25%	16%	24%	27%	30%	23%	18%
Not very Important	16%	20%	13%	24%	18%	12%	16%	9%	13%
Unimportant	12%	17%	9%	22%	17%	12%	7%	5%	7%
Totals	99%	100%	101%	100%	100%	101%	100%	100%	100%
Unweighted N	(1,496)	(680)	(816)	(323)	(209)	(384)	(235)	(149)	(109)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Very Important	48%	51%	52%	49%	42%	52%	41%	51%	55%	44%	48%	48%
Somewhat Important	23%	22%	18%	25%	25%	23%	23%	26%	24%	24%	22%	23%
Not very Important	16%	16%	20%	14%	17%	13%	24%	11%	10%	21%	16%	18%
Unimportant	12%	10%	10%	12%	16%	11%	12%	12%	11%	12%	14%	11%
Totals	99%	99%	100%	100%	100%	99%	100%	100%	100%	101%	100%	100%
Unweighted N	(1,496)	(189)	(305)	(613)	(389)	(518)	(439)	(373)	(244)	(372)	(496)	(384)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Very Important	48%	59%	36%	65%	42%	34%	64%	47%	37%
Somewhat Important	23%	29%	21%	25%	21%	23%	25%	25%	20%
Not very Important	16%	9%	19%	7%	22%	22%	7%	18%	22%
Unimportant	12%	3%	24%	3%	15%	20%	4%	10%	21%
Totals	99%	100%	100%	100%	100%	99%	100%	100%	100%
Unweighted N	(1,496)	(799)	(598)	(603)	(427)	(466)	(482)	(488)	(483)

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60J. Issue Importance — Crime and criminal justice reform

How important are the following issues to you?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Very Important	52%	43%	58%	39%	38%	59%	44%	75%	64%
Somewhat Important	35%	39%	32%	36%	44%	34%	42%	18%	31%
Not very Important	11%	16%	8%	21%	17%	6%	12%	7%	1%
Unimportant	2%	3%	2%	4%	1%	1%	2%	1%	5%
Totals	100%	101%	100%	100%	100%	100%	100%	101%	101%
Unweighted N	(1,497)	(681)	(816)	(324)	(209)	(384)	(235)	(149)	(109)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Very Important	52%	53%	52%	49%	54%	58%	49%	43%	49%	51%	53%	52%
Somewhat Important	35%	35%	29%	38%	37%	30%	37%	42%	39%	36%	34%	32%
Not very Important	11%	11%	15%	11%	9%	9%	12%	13%	10%	11%	12%	12%
Unimportant	2%	1%	5%	2%	1%	3%	2%	2%	3%	2%	1%	4%
Totals	100%	100%	101%	100%	101%	100%	100%	100%	101%	100%	100%	100%
Unweighted N	(1,497)	(189)	(306)	(613)	(389)	(519)	(439)	(373)	(244)	(372)	(497)	(384)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Very Important	52%	61%	42%	64%	44%	44%	64%	47%	47%
Somewhat Important	35%	34%	39%	31%	39%	37%	30%	39%	36%
Not very Important	11%	5%	15%	5%	15%	16%	5%	12%	15%
Unimportant	2%	1%	3%	1%	2%	4%	1%	2%	2%
Totals	100%	101%	99%	101%	100%	101%	100%	100%	100%
Unweighted N	(1,497)	(799)	(599)	(604)	(427)	(466)	(482)	(489)	(483)

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61. Most Important Issue

Which of these is the most important issue for you?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Jobs and the economy	24%	27%	21%	27%	26%	21%	22%	21%	24%
Immigration	5%	6%	4%	9%	4%	6%	2%	2%	10%
Climate change and the environment	11%	11%	12%	6%	17%	9%	18%	4%	12%
National Security and foreign policy	6%	6%	6%	7%	8%	6%	9%	2%	3%
Education	4%	4%	4%	2%	4%	3%	4%	7%	5%
Health care	23%	21%	24%	19%	19%	26%	20%	33%	24%
Taxes and government spending	10%	11%	10%	14%	10%	12%	11%	2%	7%
Civil rights and civil liberties	11%	9%	13%	8%	8%	10%	11%	23%	7%
Gun control	4%	4%	3%	6%	3%	2%	2%	4%	7%
Crime and criminal justice reform	2%	1%	3%	1%	2%	3%	1%	3%	1%
Totals	100%	100%	100%	99%	101%	98%	100%	101%	100%
Unweighted N	(1,453)	(662)	(791)	(315)	(208)	(375)	(227)	(139)	(105)

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	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Jobs and the economy	24%	19%	23%	26%	23%	22%	27%	24%	21%	26%	26%	20%
Immigration	5%	8%	3%	3%	8%	8%	4%	2%	5%	4%	4%	8%
Climate change and the environment	11%	13%	11%	10%	12%	8%	13%	14%	16%	11%	7%	14%
National Security and foreign policy	6%	5%	5%	5%	9%	4%	8%	6%	8%	4%	6%	6%
Education	4%	10%	8%	3%	0%	4%	4%	5%	3%	4%	4%	6%
Health care	23%	12%	22%	28%	22%	26%	20%	22%	23%	22%	25%	20%
Taxes and government spending	10%	6%	7%	12%	13%	7%	11%	14%	10%	12%	10%	10%
Civil rights and civil liberties	11%	15%	15%	9%	9%	14%	8%	9%	10%	10%	12%	11%
Gun control	4%	6%	6%	3%	2%	5%	2%	3%	2%	3%	4%	4%
Crime and criminal justice reform	2%	5%	1%	1%	3%	2%	2%	1%	1%	3%	2%	2%
Totals	100%	99%	101%	100%	101%	100%	99%	100%	99%	99%	100%	101%
Unweighted N	(1,453)	(175)	(288)	(603)	(387)	(497)	(426)	(367)	(237)	(361)	(485)	(370)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Jobs and the economy	24%	14%	35%	16%	24%	32%	10%	27%	31%
Immigration	5%	1%	9%	2%	6%	8%	2%	4%	9%
Climate change and the environment	11%	24%	1%	21%	9%	2%	29%	8%	1%
National Security and foreign policy	6%	3%	9%	2%	5%	11%	2%	5%	11%
Education	4%	4%	3%	5%	4%	3%	4%	5%	3%
Health care	23%	36%	9%	35%	20%	12%	35%	25%	11%
Taxes and government spending	10%	2%	20%	3%	12%	18%	2%	10%	17%
Civil rights and civil liberties	11%	12%	8%	12%	13%	8%	14%	11%	10%
Gun control	4%	3%	4%	3%	4%	4%	3%	3%	5%
Crime and criminal justice reform	2%	2%	3%	2%	2%	2%	1%	2%	2%
Totals	100%	101%	101%	101%	99%	100%	102%	100%	100%
Unweighted N	(1,453)	(777)	(586)	(590)	(411)	(452)	(474)	(466)	(474)

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62A. Favorability of Individuals — Donald Trump

Do you have a favorable or an unfavorable opinion of the following people?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Very favorable	33%	35%	32%	45%	34%	49%	29%	6%	17%
Somewhat favorable	12%	13%	11%	15%	14%	10%	14%	3%	17%
Somewhat unfavorable	7%	7%	7%	9%	3%	6%	4%	12%	10%
Very unfavorable	47%	44%	49%	31%	48%	35%	51%	76%	55%
Don't know	1%	0%	1%	0%	0%	1%	2%	3%	0%
Totals	100%	99%	100%	100%	99%	101%	100%	100%	99%
Unweighted N	(1,492)	(677)	(815)	(323)	(208)	(384)	(234)	(147)	(109)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Very favorable	33%	18%	28%	37%	41%	33%	32%	32%	30%	35%	37%	29%
Somewhat favorable	12%	17%	16%	9%	11%	11%	13%	13%	6%	15%	15%	9%
Somewhat unfavorable	7%	11%	10%	7%	3%	8%	8%	4%	9%	5%	5%	10%
Very unfavorable	47%	52%	44%	48%	44%	46%	46%	52%	54%	45%	41%	51%
Don't know	1%	2%	2%	0%	0%	1%	1%	0%	0%	0%	2%	0%
Totals	100%	100%	100%	101%	99%	99%	100%	101%	99%	100%	100%	99%
Unweighted N	(1,492)	(186)	(305)	(612)	(389)	(518)	(438)	(372)	(243)	(371)	(495)	(383)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Very favorable	33%	1%	72%	3%	27%	73%	2%	21%	70%
Somewhat favorable	12%	1%	21%	2%	18%	18%	4%	16%	15%
Somewhat unfavorable	7%	4%	5%	7%	10%	4%	1%	13%	5%
Very unfavorable	47%	93%	1%	87%	43%	4%	93%	49%	8%
Don't know	1%	0%	0%	0%	1%	1%	0%	1%	1%
Totals	100%	99%	99%	99%	99%	100%	100%	100%	99%
Unweighted N	(1,492)	(796)	(598)	(603)	(425)	(464)	(480)	(487)	(483)

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62B. Favorability of Individuals — Joe Biden

Do you have a favorable or an unfavorable opinion of the following people?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Very favorable	33%	30%	36%	23%	26%	28%	33%	65%	43%
Somewhat favorable	16%	18%	15%	11%	21%	10%	21%	15%	20%
Somewhat unfavorable	13%	14%	12%	17%	15%	12%	9%	12%	7%
Very unfavorable	37%	38%	36%	49%	38%	48%	35%	8%	28%
Don't know	1%	0%	1%	0%	0%	1%	2%	0%	2%
Totals	100%	100%	100%	100%	100%	99%	100%	100%	100%
Unweighted N	(1,488)	(676)	(812)	(320)	(209)	(382)	(235)	(147)	(108)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Very favorable	33%	28%	27%	37%	35%	37%	29%	34%	38%	31%	32%	34%
Somewhat favorable	16%	30%	21%	14%	7%	15%	16%	21%	20%	15%	10%	24%
Somewhat unfavorable	13%	20%	18%	9%	11%	12%	17%	8%	9%	14%	16%	8%
Very unfavorable	37%	22%	32%	39%	47%	35%	35%	36%	31%	40%	40%	33%
Don't know	1%	0%	2%	1%	0%	1%	2%	0%	1%	0%	1%	1%
Totals	100%	100%	100%	100%	100%	100%	99%	99%	99%	100%	99%	100%
Unweighted N	(1,488)	(189)	(302)	(610)	(387)	(516)	(437)	(370)	(243)	(371)	(492)	(382)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Very favorable	33%	67%	2%	71%	18%	4%	63%	36%	7%
Somewhat favorable	16%	27%	3%	21%	25%	4%	27%	21%	3%
Somewhat unfavorable	13%	4%	16%	5%	16%	18%	6%	14%	17%
Very unfavorable	37%	2%	78%	3%	41%	72%	4%	28%	72%
Don't know	1%	0%	1%	1%	1%	1%	0%	0%	2%
Totals	100%	100%	100%	101%	101%	99%	100%	99%	101%
Unweighted N	(1,488)	(798)	(592)	(601)	(425)	(462)	(481)	(484)	(481)

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62C. Favorability of Individuals — Mike Pence

Do you have a favorable or an unfavorable opinion of the following people?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Very favorable	31%	33%	30%	42%	36%	44%	29%	4%	17%
Somewhat favorable	13%	16%	11%	20%	14%	10%	11%	10%	15%
Somewhat unfavorable	12%	11%	13%	6%	11%	12%	13%	19%	13%
Very unfavorable	39%	38%	40%	30%	38%	30%	41%	60%	44%
Don't know	4%	1%	6%	2%	0%	4%	5%	7%	10%
Totals	99%	99%	100%	100%	99%	100%	99%	100%	99%
Unweighted N	(1,489)	(675)	(814)	(321)	(209)	(382)	(235)	(147)	(108)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Very favorable	31%	12%	22%	33%	46%	29%	29%	34%	22%	35%	36%	27%
Somewhat favorable	13%	18%	16%	13%	9%	14%	16%	10%	12%	15%	13%	13%
Somewhat unfavorable	12%	19%	15%	11%	8%	13%	14%	11%	15%	13%	10%	13%
Very unfavorable	39%	44%	38%	40%	36%	37%	39%	43%	46%	37%	36%	40%
Don't know	4%	8%	9%	2%	1%	7%	2%	2%	5%	1%	4%	6%
Totals	99%	101%	100%	99%	100%	100%	100%	100%	100%	101%	99%	99%
Unweighted N	(1,489)	(185)	(304)	(613)	(387)	(515)	(438)	(372)	(243)	(372)	(492)	(382)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Very favorable	31%	1%	71%	2%	24%	71%	3%	17%	69%
Somewhat favorable	13%	4%	21%	7%	19%	16%	3%	19%	16%
Somewhat unfavorable	12%	16%	5%	13%	18%	6%	10%	21%	5%
Very unfavorable	39%	77%	1%	74%	34%	4%	82%	39%	7%
Don't know	4%	2%	2%	4%	5%	3%	1%	5%	4%
Totals	99%	100%	100%	100%	100%	100%	99%	101%	101%
Unweighted N	(1,489)	(797)	(595)	(603)	(422)	(464)	(481)	(485)	(481)

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62D. Favorability of Individuals — Kamala Harris

Do you have a favorable or an unfavorable opinion of the following people?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Very favorable	32%	29%	35%	19%	29%	26%	35%	64%	37%
Somewhat favorable	14%	15%	14%	12%	17%	10%	16%	9%	22%
Somewhat unfavorable	7%	7%	7%	9%	5%	6%	5%	14%	4%
Very unfavorable	42%	46%	39%	57%	49%	53%	40%	8%	29%
Don't know	4%	2%	6%	2%	1%	5%	4%	5%	9%
Totals	99%	99%	101%	99%	101%	100%	100%	100%	101%
Unweighted N	(1,490)	(676)	(814)	(321)	(209)	(384)	(233)	(147)	(109)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Very favorable	32%	23%	29%	37%	33%	32%	28%	38%	40%	29%	31%	32%
Somewhat favorable	14%	26%	18%	13%	7%	15%	15%	14%	14%	18%	11%	17%
Somewhat unfavorable	7%	19%	10%	4%	3%	8%	9%	5%	8%	7%	7%	7%
Very unfavorable	42%	22%	36%	44%	55%	38%	44%	40%	33%	43%	48%	37%
Don't know	4%	10%	7%	2%	1%	6%	4%	3%	4%	2%	3%	7%
Totals	99%	100%	100%	100%	99%	99%	100%	100%	99%	99%	100%	100%
Unweighted N	(1,490)	(187)	(304)	(612)	(387)	(516)	(438)	(371)	(243)	(370)	(493)	(384)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Very favorable	32%	66%	3%	69%	17%	3%	68%	30%	7%
Somewhat favorable	14%	24%	2%	18%	24%	3%	22%	19%	4%
Somewhat unfavorable	7%	5%	6%	6%	9%	7%	4%	13%	3%
Very unfavorable	42%	3%	88%	4%	44%	83%	5%	33%	82%
Don't know	4%	2%	2%	4%	6%	3%	1%	5%	4%
Totals	99%	100%	101%	101%	100%	99%	100%	100%	100%
Unweighted N	(1,490)	(795)	(597)	(601)	(425)	(464)	(481)	(485)	(482)

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62E. Favorability of Individuals — Nancy Pelosi

Do you have a favorable or an unfavorable opinion of the following people?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Very favorable	20%	17%	22%	11%	15%	17%	20%	43%	25%
Somewhat favorable	19%	19%	19%	13%	19%	13%	24%	20%	29%
Somewhat unfavorable	11%	10%	12%	7%	13%	8%	12%	20%	10%
Very unfavorable	46%	50%	41%	66%	51%	57%	40%	9%	28%
Don't know	5%	3%	6%	3%	2%	5%	5%	8%	7%
Totals	101%	99%	100%	100%	100%	100%	101%	100%	99%
Unweighted N	(1,488)	(677)	(811)	(322)	(208)	(383)	(233)	(148)	(108)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Very favorable	20%	17%	17%	20%	23%	21%	17%	21%	24%	16%	21%	18%
Somewhat favorable	19%	21%	18%	22%	14%	18%	19%	22%	21%	21%	14%	23%
Somewhat unfavorable	11%	20%	16%	8%	6%	12%	13%	10%	13%	10%	10%	12%
Very unfavorable	46%	30%	41%	47%	55%	42%	47%	44%	36%	49%	51%	40%
Don't know	5%	12%	8%	3%	1%	7%	4%	3%	5%	3%	5%	5%
Totals	101%	100%	100%	100%	99%	100%	100%	100%	99%	99%	101%	98%
Unweighted N	(1,488)	(186)	(303)	(613)	(386)	(515)	(437)	(371)	(242)	(370)	(495)	(381)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Very favorable	20%	39%	2%	44%	7%	3%	43%	16%	5%
Somewhat favorable	19%	38%	1%	35%	17%	2%	36%	23%	3%
Somewhat unfavorable	11%	14%	6%	11%	14%	8%	12%	16%	6%
Very unfavorable	46%	6%	90%	4%	54%	85%	6%	39%	84%
Don't know	5%	3%	1%	6%	7%	1%	3%	7%	2%
Totals	101%	100%	100%	100%	99%	99%	100%	101%	100%
Unweighted N	(1,488)	(795)	(596)	(599)	(425)	(464)	(480)	(485)	(482)

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62F. Favorability of Individuals — Mitch McConnell

Do you have a favorable or an unfavorable opinion of the following people?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Very favorable	12%	15%	10%	17%	14%	15%	9%	4%	10%
Somewhat favorable	22%	26%	18%	32%	27%	24%	19%	7%	15%
Somewhat unfavorable	13%	14%	13%	13%	14%	12%	10%	15%	14%
Very unfavorable	42%	42%	42%	35%	45%	32%	51%	63%	42%
Don't know	11%	4%	17%	2%	1%	18%	11%	11%	19%
Totals	100%	101%	100%	99%	101%	101%	100%	100%	100%
Unweighted N	(1,487)	(675)	(812)	(321)	(209)	(381)	(235)	(146)	(109)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Very favorable	12%	6%	11%	9%	21%	12%	11%	15%	9%	15%	13%	11%
Somewhat favorable	22%	9%	18%	24%	27%	19%	23%	21%	18%	22%	24%	20%
Somewhat unfavorable	13%	21%	15%	12%	10%	16%	13%	11%	16%	12%	12%	14%
Very unfavorable	42%	38%	41%	47%	39%	38%	43%	48%	50%	43%	39%	42%
Don't know	11%	26%	15%	7%	4%	15%	10%	6%	7%	9%	12%	13%
Totals	100%	100%	100%	99%	101%	100%	100%	101%	100%	101%	100%	100%
Unweighted N	(1,487)	(187)	(301)	(612)	(387)	(512)	(439)	(371)	(243)	(368)	(494)	(382)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Very favorable	12%	2%	27%	3%	7%	27%	4%	6%	25%
Somewhat favorable	22%	4%	42%	5%	23%	39%	4%	17%	40%
Somewhat unfavorable	13%	10%	14%	12%	16%	12%	5%	19%	14%
Very unfavorable	42%	80%	8%	72%	42%	8%	84%	47%	6%
Don't know	11%	5%	9%	7%	11%	14%	3%	11%	14%
Totals	100%	101%	100%	99%	99%	100%	100%	100%	99%
Unweighted N	(1,487)	(794)	(596)	(599)	(424)	(464)	(482)	(481)	(482)

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63A. Favorability of Political Parties — The Democratic Party

Do you have a favorable or unfavorable opinion of the political parties?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Very favorable	23%	21%	25%	11%	14%	21%	18%	58%	31%
Somewhat favorable	22%	22%	23%	18%	29%	16%	31%	24%	22%
Somewhat unfavorable	13%	13%	13%	15%	11%	12%	16%	10%	16%
Very unfavorable	38%	43%	34%	54%	45%	49%	31%	6%	21%
Don't know	3%	2%	4%	2%	0%	3%	4%	2%	9%
Totals	99%	101%	99%	100%	99%	101%	100%	100%	99%
Unweighted N	(1,482)	(673)	(809)	(321)	(208)	(379)	(234)	(146)	(108)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Very favorable	23%	23%	20%	24%	24%	29%	20%	19%	29%	19%	23%	22%
Somewhat favorable	22%	30%	24%	24%	15%	19%	24%	30%	23%	24%	19%	25%
Somewhat unfavorable	13%	17%	20%	10%	10%	13%	16%	12%	12%	13%	12%	16%
Very unfavorable	38%	26%	30%	40%	50%	36%	35%	38%	31%	43%	42%	33%
Don't know	3%	5%	6%	2%	0%	4%	4%	1%	4%	1%	4%	3%
Totals	99%	101%	100%	100%	99%	101%	99%	100%	99%	100%	100%	99%
Unweighted N	(1,482)	(187)	(303)	(611)	(381)	(512)	(437)	(369)	(244)	(369)	(490)	(379)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Very favorable	23%	46%	2%	52%	8%	2%	47%	21%	7%
Somewhat favorable	22%	42%	3%	38%	23%	4%	42%	28%	3%
Somewhat unfavorable	13%	9%	13%	6%	22%	15%	7%	19%	12%
Very unfavorable	38%	3%	81%	2%	41%	78%	5%	28%	77%
Don't know	3%	1%	1%	2%	6%	2%	0%	4%	2%
Totals	99%	101%	100%	100%	100%	101%	101%	100%	101%
Unweighted N	(1,482)	(795)	(590)	(602)	(424)	(456)	(481)	(485)	(474)

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63B. Favorability of Political Parties — The Republican Party

Do you have a favorable or unfavorable opinion of the political parties?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Very favorable	18%	19%	18%	25%	18%	30%	14%	2%	16%
Somewhat favorable	23%	23%	23%	29%	24%	28%	26%	8%	11%
Somewhat unfavorable	18%	17%	18%	12%	17%	16%	13%	26%	27%
Very unfavorable	38%	40%	37%	33%	40%	24%	44%	58%	37%
Don't know	3%	2%	4%	2%	0%	2%	3%	6%	9%
Totals	100%	101%	100%	101%	99%	100%	100%	100%	100%
Unweighted N	(1,489)	(678)	(811)	(321)	(209)	(383)	(232)	(149)	(108)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Very favorable	18%	9%	20%	16%	25%	19%	18%	17%	14%	18%	21%	18%
Somewhat favorable	23%	25%	19%	24%	23%	22%	23%	23%	16%	28%	26%	19%
Somewhat unfavorable	18%	19%	16%	19%	17%	19%	18%	16%	17%	13%	18%	22%
Very unfavorable	38%	39%	41%	39%	34%	35%	37%	44%	49%	40%	32%	39%
Don't know	3%	8%	4%	2%	1%	5%	4%	0%	5%	1%	4%	3%
Totals	100%	100%	100%	100%	100%	100%	100%	100%	101%	100%	101%	101%
Unweighted N	(1,489)	(186)	(304)	(611)	(388)	(515)	(438)	(371)	(242)	(371)	(493)	(383)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Very favorable	18%	1%	40%	2%	6%	48%	2%	9%	40%
Somewhat favorable	23%	4%	44%	3%	28%	41%	2%	22%	41%
Somewhat unfavorable	18%	19%	12%	19%	28%	7%	12%	27%	13%
Very unfavorable	38%	75%	3%	73%	32%	4%	83%	36%	6%
Don't know	3%	2%	1%	3%	6%	0%	0%	5%	1%
Totals	100%	101%	100%	100%	100%	100%	99%	99%	101%
Unweighted N	(1,489)	(795)	(596)	(601)	(425)	(463)	(481)	(484)	(482)

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64. Trump Job Approval

Do you approve or disapprove of the way Donald Trump is handling his job as President?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Strongly approve	32%	34%	30%	43%	33%	46%	28%	6%	18%
Somewhat approve	14%	15%	13%	19%	15%	12%	15%	7%	17%
Somewhat disapprove	6%	6%	6%	6%	4%	5%	4%	7%	14%
Strongly disapprove	45%	42%	48%	29%	47%	35%	50%	75%	48%
Not sure	2%	2%	2%	2%	1%	1%	3%	4%	2%
Totals	99%	99%	99%	99%	100%	99%	100%	99%	99%
Unweighted N	(1,500)	(683)	(817)	(324)	(209)	(384)	(235)	(150)	(111)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Strongly approve	32%	14%	27%	35%	42%	31%	28%	33%	25%	34%	36%	29%
Somewhat approve	14%	25%	15%	11%	11%	14%	17%	12%	10%	15%	15%	14%
Somewhat disapprove	6%	13%	8%	5%	4%	9%	6%	3%	8%	7%	6%	6%
Strongly disapprove	45%	45%	44%	48%	43%	44%	45%	51%	54%	43%	40%	50%
Not sure	2%	3%	6%	1%	0%	2%	4%	0%	2%	1%	3%	1%
Totals	99%	100%	100%	100%	100%	100%	100%	99%	99%	100%	100%	100%
Unweighted N	(1,500)	(191)	(307)	(613)	(389)	(522)	(439)	(373)	(244)	(373)	(498)	(385)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Strongly approve	32%	1%	72%	3%	28%	69%	3%	20%	68%
Somewhat approve	14%	2%	23%	5%	15%	23%	2%	19%	20%
Somewhat disapprove	6%	5%	3%	6%	12%	2%	4%	12%	4%
Strongly disapprove	45%	92%	1%	86%	39%	5%	92%	47%	8%
Not sure	2%	0%	1%	0%	5%	1%	0%	3%	2%
Totals	99%	100%	100%	100%	99%	100%	101%	101%	102%
Unweighted N	(1,500)	(802)	(599)	(607)	(427)	(466)	(484)	(489)	(484)

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65A. Trump Approval on Issues — Jobs and the economy

Do you approve or disapprove of the way Donald Trump is handling these specific issues?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Strongly approve	40%	45%	36%	55%	46%	49%	34%	9%	30%
Somewhat approve	14%	14%	15%	15%	11%	16%	16%	12%	13%
Somewhat disapprove	13%	12%	13%	10%	12%	8%	12%	21%	17%
Strongly disapprove	30%	28%	32%	18%	31%	24%	35%	51%	33%
No opinion	3%	2%	3%	2%	1%	3%	2%	7%	7%
Totals	100%	101%	99%	100%	101%	100%	99%	100%	100%
Unweighted N	(1,479)	(677)	(802)	(321)	(209)	(380)	(230)	(147)	(106)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Strongly approve	40%	27%	36%	42%	48%	35%	42%	42%	31%	42%	48%	33%
Somewhat approve	14%	18%	23%	11%	9%	17%	15%	9%	17%	17%	12%	13%
Somewhat disapprove	13%	19%	10%	13%	10%	16%	11%	14%	8%	11%	11%	20%
Strongly disapprove	30%	34%	28%	31%	29%	29%	29%	33%	40%	28%	26%	30%
No opinion	3%	2%	3%	2%	4%	3%	3%	2%	4%	2%	2%	4%
Totals	100%	100%	100%	99%	100%	100%	100%	100%	100%	100%	99%	100%
Unweighted N	(1,479)	(184)	(302)	(608)	(385)	(509)	(434)	(371)	(238)	(371)	(489)	(381)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Strongly approve	40%	3%	85%	7%	37%	80%	5%	31%	78%
Somewhat approve	14%	10%	13%	9%	20%	15%	6%	22%	13%
Somewhat disapprove	13%	22%	1%	20%	14%	2%	17%	17%	4%
Strongly disapprove	30%	63%	0%	62%	22%	2%	71%	25%	3%
No opinion	3%	2%	1%	2%	6%	1%	1%	5%	2%
Totals	100%	100%	100%	100%	99%	100%	100%	100%	100%
Unweighted N	(1,479)	(789)	(593)	(595)	(424)	(460)	(477)	(483)	(478)

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65B. Trump Approval on Issues — Immigration

Do you approve or disapprove of the way Donald Trump is handling these specific issues?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Strongly approve	36%	40%	33%	51%	38%	46%	29%	15%	26%
Somewhat approve	12%	12%	12%	13%	13%	11%	16%	7%	13%
Somewhat disapprove	7%	9%	6%	7%	5%	5%	4%	13%	11%
Strongly disapprove	42%	38%	46%	25%	44%	35%	48%	63%	50%
No opinion	2%	2%	3%	3%	0%	2%	4%	1%	1%
Totals	99%	101%	100%	99%	100%	99%	101%	99%	101%
Unweighted N	(1,478)	(671)	(807)	(320)	(206)	(382)	(232)	(144)	(109)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Strongly approve	36%	21%	32%	38%	45%	36%	34%	37%	27%	38%	44%	30%
Somewhat approve	12%	14%	17%	10%	10%	13%	13%	9%	12%	14%	11%	11%
Somewhat disapprove	7%	12%	8%	6%	6%	7%	11%	6%	6%	7%	6%	11%
Strongly disapprove	42%	49%	38%	45%	38%	40%	41%	49%	53%	39%	37%	46%
No opinion	2%	4%	5%	1%	1%	3%	2%	0%	2%	2%	2%	2%
Totals	99%	100%	100%	100%	100%	99%	101%	101%	100%	100%	100%	100%
Unweighted N	(1,478)	(186)	(301)	(606)	(385)	(513)	(434)	(367)	(239)	(371)	(488)	(380)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Strongly approve	36%	3%	78%	7%	32%	73%	4%	26%	73%
Somewhat approve	12%	4%	16%	5%	15%	18%	4%	16%	15%
Somewhat disapprove	7%	9%	2%	9%	11%	3%	5%	12%	3%
Strongly disapprove	42%	84%	3%	79%	37%	5%	87%	43%	7%
No opinion	2%	0%	2%	0%	5%	2%	0%	3%	2%
Totals	99%	100%	101%	100%	100%	101%	100%	100%	100%
Unweighted N	(1,478)	(791)	(590)	(597)	(422)	(459)	(480)	(478)	(478)

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65C. Trump Approval on Issues — Climate change and the environment

Do you approve or disapprove of the way Donald Trump is handling these specific issues?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Strongly approve	26%	28%	24%	34%	30%	35%	20%	4%	19%
Somewhat approve	13%	14%	12%	14%	16%	13%	13%	10%	16%
Somewhat disapprove	9%	9%	9%	9%	4%	7%	8%	10%	16%
Strongly disapprove	43%	40%	45%	30%	46%	33%	52%	65%	42%
No opinion	9%	8%	10%	13%	4%	11%	7%	11%	8%
Totals	100%	99%	100%	100%	100%	99%	100%	100%	101%
Unweighted N	(1,482)	(672)	(810)	(320)	(206)	(382)	(232)	(146)	(109)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Strongly approve	26%	18%	21%	29%	30%	24%	22%	31%	21%	29%	30%	22%
Somewhat approve	13%	12%	14%	12%	15%	15%	12%	11%	11%	11%	16%	12%
Somewhat disapprove	9%	13%	12%	7%	6%	10%	14%	3%	8%	9%	8%	12%
Strongly disapprove	43%	46%	40%	46%	39%	40%	42%	51%	53%	43%	36%	47%
No opinion	9%	10%	13%	6%	10%	11%	11%	3%	7%	9%	11%	8%
Totals	100%	99%	100%	100%	100%	100%	101%	99%	100%	101%	101%	101%
Unweighted N	(1,482)	(186)	(301)	(608)	(387)	(516)	(435)	(366)	(240)	(370)	(491)	(381)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Strongly approve	26%	2%	58%	3%	25%	52%	3%	16%	55%
Somewhat approve	13%	2%	24%	3%	13%	24%	2%	14%	21%
Somewhat disapprove	9%	7%	5%	8%	14%	6%	3%	16%	6%
Strongly disapprove	43%	87%	2%	80%	39%	4%	91%	44%	5%
No opinion	9%	3%	11%	5%	9%	13%	1%	10%	13%
Totals	100%	101%	100%	99%	100%	99%	100%	100%	100%
Unweighted N	(1,482)	(792)	(592)	(599)	(421)	(462)	(481)	(480)	(479)

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65D. Trump Approval on Issues — Terrorism

Do you approve or disapprove of the way Donald Trump is handling these specific issues?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Strongly approve	38%	41%	34%	52%	41%	46%	32%	10%	29%
Somewhat approve	13%	13%	12%	15%	12%	12%	13%	14%	11%
Somewhat disapprove	9%	10%	9%	7%	9%	5%	8%	17%	14%
Strongly disapprove	36%	33%	39%	22%	37%	30%	45%	54%	35%
No opinion	5%	3%	6%	4%	0%	7%	3%	5%	10%
Totals	101%	100%	100%	100%	99%	100%	101%	100%	99%
Unweighted N	(1,479)	(675)	(804)	(321)	(209)	(380)	(230)	(147)	(107)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Strongly approve	38%	22%	33%	41%	44%	34%	37%	40%	28%	41%	43%	32%
Somewhat approve	13%	16%	17%	10%	10%	17%	12%	9%	13%	11%	13%	14%
Somewhat disapprove	9%	15%	9%	9%	6%	9%	10%	10%	7%	10%	7%	14%
Strongly disapprove	36%	39%	33%	37%	35%	34%	36%	40%	46%	34%	33%	35%
No opinion	5%	8%	8%	2%	4%	6%	5%	0%	5%	4%	4%	5%
Totals	101%	100%	100%	99%	99%	100%	100%	99%	99%	100%	100%	100%
Unweighted N	(1,479)	(186)	(300)	(609)	(384)	(510)	(434)	(370)	(240)	(369)	(490)	(380)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Strongly approve	38%	2%	80%	5%	37%	75%	4%	27%	75%
Somewhat approve	13%	6%	15%	7%	14%	17%	6%	17%	14%
Somewhat disapprove	9%	15%	2%	12%	13%	3%	10%	13%	4%
Strongly disapprove	36%	75%	0%	71%	28%	3%	79%	34%	5%
No opinion	5%	2%	2%	4%	8%	2%	2%	8%	2%
Totals	101%	100%	99%	99%	100%	100%	101%	99%	100%
Unweighted N	(1,479)	(789)	(592)	(596)	(424)	(459)	(480)	(480)	(477)

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65E. Trump Approval on Issues — Education

Do you approve or disapprove of the way Donald Trump is handling these specific issues?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Strongly approve	24%	23%	25%	28%	21%	37%	18%	7%	22%
Somewhat approve	17%	19%	15%	21%	23%	15%	22%	9%	12%
Somewhat disapprove	10%	8%	11%	7%	6%	9%	9%	16%	13%
Strongly disapprove	38%	38%	39%	27%	41%	28%	42%	58%	48%
No opinion	11%	12%	10%	17%	10%	11%	9%	10%	4%
Totals	100%	100%	100%	100%	101%	100%	100%	100%	99%
Unweighted N	(1,475)	(672)	(803)	(321)	(205)	(379)	(231)	(147)	(107)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Strongly approve	24%	15%	24%	27%	25%	25%	19%	25%	23%	22%	28%	19%
Somewhat approve	17%	15%	15%	16%	22%	18%	17%	16%	10%	22%	19%	15%
Somewhat disapprove	10%	16%	7%	11%	7%	11%	12%	7%	8%	9%	8%	15%
Strongly disapprove	38%	43%	38%	38%	36%	36%	38%	43%	47%	35%	34%	42%
No opinion	11%	10%	16%	9%	10%	11%	14%	8%	11%	11%	12%	9%
Totals	100%	99%	100%	101%	100%	101%	100%	99%	99%	99%	101%	100%
Unweighted N	(1,475)	(186)	(298)	(606)	(385)	(510)	(433)	(368)	(238)	(369)	(487)	(381)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Strongly approve	24%	2%	53%	4%	19%	50%	3%	16%	49%
Somewhat approve	17%	2%	32%	5%	18%	30%	2%	18%	29%
Somewhat disapprove	10%	14%	4%	13%	12%	4%	8%	16%	4%
Strongly disapprove	38%	77%	1%	73%	35%	2%	84%	38%	4%
No opinion	11%	5%	10%	5%	16%	13%	3%	13%	15%
Totals	100%	100%	100%	100%	100%	99%	100%	101%	101%
Unweighted N	(1,475)	(788)	(589)	(596)	(421)	(458)	(478)	(478)	(476)

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65F. Trump Approval on Issues — Health care

Do you approve or disapprove of the way Donald Trump is handling these specific issues?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Strongly approve	25%	24%	26%	32%	20%	37%	20%	7%	25%
Somewhat approve	18%	20%	16%	23%	24%	16%	20%	5%	14%
Somewhat disapprove	9%	9%	8%	6%	10%	7%	6%	11%	15%
Strongly disapprove	43%	41%	44%	30%	43%	33%	48%	70%	43%
No opinion	6%	6%	6%	9%	3%	6%	5%	7%	3%
Totals	101%	100%	100%	100%	100%	99%	99%	100%	100%
Unweighted N	(1,472)	(667)	(805)	(319)	(203)	(378)	(232)	(147)	(107)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Strongly approve	25%	16%	27%	28%	24%	28%	19%	25%	18%	24%	31%	20%
Somewhat approve	18%	19%	18%	14%	22%	15%	20%	18%	14%	23%	17%	17%
Somewhat disapprove	9%	14%	9%	8%	6%	10%	11%	6%	10%	6%	9%	9%
Strongly disapprove	43%	46%	38%	46%	42%	41%	44%	48%	52%	41%	37%	47%
No opinion	6%	6%	8%	4%	6%	6%	7%	3%	6%	6%	5%	6%
Totals	101%	101%	100%	100%	100%	100%	101%	100%	100%	100%	99%	99%
Unweighted N	(1,472)	(186)	(300)	(609)	(377)	(510)	(432)	(367)	(239)	(370)	(486)	(377)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Strongly approve	25%	2%	52%	5%	21%	51%	3%	16%	51%
Somewhat approve	18%	2%	34%	3%	20%	33%	1%	17%	32%
Somewhat disapprove	9%	9%	7%	10%	10%	6%	7%	13%	5%
Strongly disapprove	43%	86%	2%	80%	40%	3%	88%	45%	6%
No opinion	6%	2%	4%	2%	9%	7%	1%	8%	6%
Totals	101%	101%	99%	100%	100%	100%	100%	99%	100%
Unweighted N	(1,472)	(789)	(585)	(596)	(421)	(455)	(478)	(479)	(473)

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65G. Trump Approval on Issues — Taxes and government spending

Do you approve or disapprove of the way Donald Trump is handling these specific issues?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Strongly approve	29%	29%	30%	37%	27%	42%	27%	7%	27%
Somewhat approve	17%	20%	15%	21%	21%	17%	16%	11%	13%
Somewhat disapprove	12%	14%	10%	12%	12%	8%	10%	18%	15%
Strongly disapprove	38%	35%	41%	25%	39%	29%	43%	58%	43%
No opinion	4%	2%	5%	5%	0%	4%	4%	6%	3%
Totals	100%	100%	101%	100%	99%	100%	100%	100%	101%
Unweighted N	(1,478)	(674)	(804)	(322)	(208)	(378)	(231)	(146)	(106)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Strongly approve	29%	15%	30%	30%	36%	30%	28%	29%	22%	30%	35%	25%
Somewhat approve	17%	23%	17%	16%	17%	18%	17%	16%	13%	23%	17%	15%
Somewhat disapprove	12%	14%	11%	13%	9%	13%	13%	10%	15%	9%	9%	16%
Strongly disapprove	38%	46%	35%	39%	35%	34%	38%	44%	46%	35%	35%	41%
No opinion	4%	2%	7%	3%	2%	4%	5%	0%	4%	3%	4%	3%
Totals	100%	100%	100%	101%	99%	99%	101%	99%	100%	100%	100%	100%
Unweighted N	(1,478)	(186)	(302)	(605)	(385)	(507)	(436)	(370)	(239)	(367)	(492)	(380)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Strongly approve	29%	2%	63%	4%	24%	62%	4%	20%	59%
Somewhat approve	17%	5%	27%	7%	21%	27%	3%	22%	25%
Somewhat disapprove	12%	14%	7%	13%	16%	6%	10%	18%	6%
Strongly disapprove	38%	78%	1%	73%	33%	3%	83%	36%	6%
No opinion	4%	1%	2%	2%	6%	3%	1%	5%	3%
Totals	100%	100%	100%	99%	100%	101%	101%	101%	99%
Unweighted N	(1,478)	(788)	(593)	(595)	(422)	(461)	(476)	(480)	(482)

The Economist/YouGov Poll
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65H. Trump Approval on Issues — Civil rights and civil liberties

Do you approve or disapprove of the way Donald Trump is handling these specific issues?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Strongly approve	30%	29%	30%	38%	28%	43%	26%	5%	23%
Somewhat approve	18%	21%	15%	23%	22%	12%	17%	13%	22%
Somewhat disapprove	7%	7%	7%	5%	6%	7%	6%	7%	11%
Strongly disapprove	40%	38%	42%	26%	43%	31%	48%	68%	40%
No opinion	6%	5%	7%	8%	2%	7%	3%	8%	4%
Totals	101%	100%	101%	100%	101%	100%	100%	101%	100%
Unweighted N	(1,457)	(665)	(792)	(318)	(202)	(376)	(226)	(145)	(105)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Strongly approve	30%	15%	27%	33%	35%	30%	25%	32%	22%	31%	35%	25%
Somewhat approve	18%	26%	21%	13%	16%	19%	21%	13%	16%	20%	17%	18%
Somewhat disapprove	7%	10%	6%	7%	5%	8%	7%	6%	7%	6%	5%	10%
Strongly disapprove	40%	41%	37%	43%	39%	35%	41%	49%	49%	37%	36%	44%
No opinion	6%	8%	9%	4%	4%	8%	7%	1%	6%	6%	7%	3%
Totals	101%	100%	100%	100%	99%	100%	101%	101%	100%	100%	100%	100%
Unweighted N	(1,457)	(183)	(298)	(599)	(377)	(504)	(422)	(367)	(233)	(367)	(482)	(375)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Strongly approve	30%	1%	64%	4%	28%	60%	3%	19%	62%
Somewhat approve	18%	4%	27%	7%	19%	28%	3%	24%	24%
Somewhat disapprove	7%	7%	4%	7%	10%	4%	4%	11%	4%
Strongly disapprove	40%	86%	1%	79%	33%	3%	88%	39%	4%
No opinion	6%	2%	4%	3%	9%	5%	2%	7%	6%
Totals	101%	100%	100%	100%	99%	100%	100%	100%	100%
Unweighted N	(1,457)	(775)	(584)	(586)	(420)	(451)	(473)	(473)	(469)

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65I. Trump Approval on Issues — Gun control

Do you approve or disapprove of the way Donald Trump is handling these specific issues?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Strongly approve	33%	35%	31%	45%	35%	45%	26%	5%	24%
Somewhat approve	12%	13%	11%	14%	13%	11%	16%	8%	12%
Somewhat disapprove	9%	11%	8%	8%	9%	5%	7%	12%	20%
Strongly disapprove	38%	34%	41%	23%	37%	31%	43%	66%	38%
No opinion	8%	7%	9%	9%	6%	7%	8%	9%	6%
Totals	100%	100%	100%	99%	100%	99%	100%	100%	100%
Unweighted N	(1,457)	(665)	(792)	(319)	(202)	(378)	(226)	(144)	(105)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Strongly approve	33%	18%	26%	36%	41%	34%	30%	33%	24%	36%	37%	29%
Somewhat approve	12%	17%	15%	11%	9%	11%	16%	11%	14%	13%	13%	9%
Somewhat disapprove	9%	11%	12%	8%	8%	11%	8%	10%	5%	8%	9%	15%
Strongly disapprove	38%	45%	33%	40%	35%	36%	37%	42%	47%	35%	33%	42%
No opinion	8%	9%	14%	5%	7%	9%	9%	4%	9%	8%	9%	5%
Totals	100%	100%	100%	100%	100%	101%	100%	100%	99%	100%	101%	100%
Unweighted N	(1,457)	(184)	(298)	(598)	(377)	(506)	(422)	(367)	(232)	(368)	(482)	(375)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Strongly approve	33%	2%	70%	4%	29%	69%	3%	23%	68%
Somewhat approve	12%	5%	19%	5%	16%	17%	4%	15%	16%
Somewhat disapprove	9%	13%	4%	11%	13%	4%	8%	16%	4%
Strongly disapprove	38%	75%	1%	76%	27%	3%	82%	35%	4%
No opinion	8%	5%	6%	4%	15%	7%	3%	11%	8%
Totals	100%	100%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,457)	(778)	(583)	(588)	(418)	(451)	(475)	(473)	(468)

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65J. Trump Approval on Issues — Crime and criminal justice reform

Do you approve or disapprove of the way Donald Trump is handling these specific issues?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Strongly approve	30%	32%	29%	39%	35%	40%	25%	6%	27%
Somewhat approve	16%	17%	14%	19%	20%	15%	17%	9%	11%
Somewhat disapprove	10%	11%	9%	13%	9%	6%	8%	12%	16%
Strongly disapprove	36%	32%	38%	21%	34%	28%	40%	61%	39%
No opinion	8%	7%	10%	9%	2%	11%	10%	11%	8%
Totals	100%	99%	100%	101%	100%	100%	100%	99%	101%
Unweighted N	(1,456)	(666)	(790)	(319)	(202)	(376)	(225)	(144)	(105)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Strongly approve	30%	14%	26%	34%	37%	29%	26%	33%	22%	32%	35%	27%
Somewhat approve	16%	22%	18%	13%	15%	15%	19%	15%	16%	18%	16%	12%
Somewhat disapprove	10%	16%	11%	10%	6%	13%	12%	7%	9%	9%	8%	16%
Strongly disapprove	36%	40%	33%	36%	35%	34%	35%	39%	43%	35%	32%	37%
No opinion	8%	8%	11%	7%	7%	9%	9%	5%	10%	7%	9%	8%
Totals	100%	100%	99%	100%	100%	100%	101%	99%	100%	101%	100%	100%
Unweighted N	(1,456)	(183)	(299)	(601)	(373)	(502)	(424)	(367)	(231)	(367)	(483)	(375)

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		2020 Vote		Party ID			Ideology		
	Total	Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Strongly approve	30%	1%	66%	4%	27%	63%	4%	18%	64%
Somewhat approve	16%	7%	24%	6%	19%	23%	3%	21%	21%
Somewhat disapprove	10%	15%	4%	14%	13%	3%	12%	16%	3%
Strongly disapprove	36%	72%	1%	69%	29%	3%	78%	32%	6%
No opinion	8%	5%	6%	7%	11%	8%	3%	12%	7%
Totals	100%	100%	101%	100%	99%	100%	100%	99%	101%
Unweighted N	(1,456)	(776)	(585)	(585)	(419)	(452)	(474)	(472)	(469)

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66. Trump Appropriate Twitter Use

Do you think the way Donald Trump uses Twitter is appropriate or inappropriate for the President of the United States?

		Gender		White Men		White Women		Race	
	Total	Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Appropriate	31%	34%	27%	42%	31%	37%	20%	12%	28%
Inappropriate	60%	55%	64%	43%	63%	50%	72%	81%	65%
Not sure	10%	11%	9%	16%	6%	13%	7%	7%	7%
Totals	101%	100%	100%	101%	100%	100%	99%	100%	100%
Unweighted N	(1,498)	(681)	(817)	(324)	(209)	(384)	(235)	(150)	(109)

		Age				Income			Region			
	Total	18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Appropriate	31%	27%	32%	31%	30%	33%	27%	31%	27%	30%	35%	26%
Inappropriate	60%	66%	58%	60%	58%	57%	62%	64%	67%	60%	53%	65%
Not sure	10%	6%	10%	9%	12%	10%	11%	6%	6%	10%	11%	9%
Totals	101%	99%	100%	100%	100%	100%	100%	101%	100%	100%	99%	100%
Unweighted N	(1,498)	(189)	(307)	(613)	(389)	(521)	(439)	(373)	(244)	(373)	(497)	(384)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Appropriate	31%	3%	61%	6%	32%	57%	7%	22%	58%
Inappropriate	60%	95%	22%	92%	57%	26%	91%	69%	26%
Not sure	10%	2%	17%	2%	12%	16%	1%	9%	16%
Totals	101%	100%	100%	100%	101%	99%	99%	100%	100%
Unweighted N	(1,498)	(800)	(599)	(605)	(427)	(466)	(484)	(489)	(483)

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67. Approval of U.S. Congress

Overall, do you approve or disapprove of the way that the United States Congress is handling its job?

	Gender			White Men		White Women		Race	
	Total	Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Strongly approve	4%	5%	4%	5%	4%	4%	4%	3%	8%
Somewhat approve	10%	10%	11%	11%	9%	12%	13%	10%	6%
Neither approve nor disapprove	15%	12%	17%	11%	9%	17%	12%	22%	24%
Somewhat disapprove	28%	27%	28%	25%	30%	26%	34%	23%	32%
Strongly disapprove	35%	43%	29%	45%	47%	27%	29%	32%	26%
Not sure	8%	3%	11%	3%	1%	13%	9%	9%	5%
Totals	100%	100%	100%	100%	100%	99%	101%	99%	101%
Unweighted N	(1,498)	(681)	(817)	(324)	(209)	(384)	(235)	(150)	(109)

	Age					Income			Region			
	Total	18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Strongly approve	4%	5%	9%	2%	3%	5%	3%	5%	2%	3%	5%	5%
Somewhat approve	10%	7%	10%	11%	12%	10%	13%	8%	16%	11%	8%	9%
Neither approve nor disapprove	15%	24%	15%	15%	10%	20%	14%	11%	18%	16%	12%	15%
Somewhat disapprove	28%	21%	21%	32%	31%	26%	28%	33%	25%	28%	25%	34%
Strongly disapprove	35%	27%	34%	36%	40%	29%	35%	40%	31%	35%	38%	34%
Not sure	8%	15%	11%	4%	5%	10%	6%	3%	7%	7%	10%	4%
Totals	100%	99%	100%	100%	101%	100%	99%	100%	99%	100%	98%	101%
Unweighted N	(1,498)	(189)	(307)	(613)	(389)	(521)	(439)	(373)	(244)	(373)	(497)	(384)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Strongly approve	4%	2%	6%	4%	3%	6%	4%	3%	5%
Somewhat approve	10%	13%	10%	12%	6%	12%	14%	8%	10%
Neither approve nor disapprove	15%	15%	11%	16%	14%	14%	12%	19%	12%
Somewhat disapprove	28%	33%	25%	32%	29%	22%	33%	29%	24%
Strongly disapprove	35%	32%	44%	30%	38%	38%	33%	34%	40%
Not sure	8%	6%	6%	6%	10%	8%	4%	5%	10%
Totals	100%	101%	102%	100%	100%	100%	100%	98%	101%
Unweighted N	(1,498)	(800)	(599)	(605)	(427)	(466)	(484)	(489)	(483)

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68. Pelosi Job Approval

Do you approve or disapprove of the way Nancy Pelosi is handling her job as the Speaker of the U.S. House of Representatives?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Strongly approve	18%	17%	19%	10%	15%	15%	20%	33%	25%
Somewhat approve	20%	18%	23%	14%	23%	12%	27%	26%	30%
Somewhat disapprove	11%	12%	11%	10%	11%	9%	10%	17%	13%
Strongly disapprove	44%	49%	41%	62%	51%	55%	40%	16%	24%
Not sure	6%	5%	8%	5%	1%	9%	4%	9%	9%
Totals	99%	101%	102%	101%	101%	100%	101%	101%	101%
Unweighted N	(1,494)	(680)	(814)	(324)	(209)	(383)	(234)	(149)	(109)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Strongly approve	18%	12%	14%	19%	22%	19%	14%	22%	24%	14%	17%	18%
Somewhat approve	20%	23%	23%	21%	16%	19%	23%	23%	25%	20%	17%	22%
Somewhat disapprove	11%	19%	14%	10%	7%	12%	13%	10%	10%	11%	7%	18%
Strongly disapprove	44%	30%	38%	46%	54%	41%	45%	42%	35%	49%	50%	37%
Not sure	6%	17%	11%	3%	2%	9%	5%	3%	5%	5%	8%	6%
Totals	99%	101%	100%	99%	101%	100%	100%	100%	99%	99%	99%	101%
Unweighted N	(1,494)	(189)	(306)	(613)	(386)	(520)	(438)	(373)	(244)	(372)	(494)	(384)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Strongly approve	18%	35%	2%	39%	8%	2%	40%	15%	3%
Somewhat approve	20%	39%	3%	37%	18%	5%	37%	25%	5%
Somewhat disapprove	11%	14%	5%	12%	14%	7%	11%	18%	5%
Strongly disapprove	44%	8%	89%	6%	48%	84%	8%	35%	84%
Not sure	6%	4%	2%	6%	11%	2%	4%	8%	3%
Totals	99%	100%	101%	100%	99%	100%	100%	101%	100%
Unweighted N	(1,494)	(799)	(597)	(603)	(426)	(465)	(484)	(486)	(482)

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69. McConnell Job Approval

Do you approve or disapprove of the way Mitch McConnell is handling his job as Majority Leader of the U.S. Senate?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Strongly approve	13%	15%	11%	18%	16%	15%	8%	4%	12%
Somewhat approve	24%	28%	20%	35%	26%	24%	24%	9%	19%
Somewhat disapprove	11%	11%	12%	10%	12%	10%	10%	13%	13%
Strongly disapprove	41%	41%	40%	33%	44%	33%	47%	61%	36%
Not sure	11%	5%	16%	4%	2%	18%	11%	12%	19%
Totals	100%	100%	99%	100%	100%	100%	100%	99%	99%
Unweighted N	(1,492)	(680)	(812)	(324)	(208)	(380)	(234)	(150)	(109)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Strongly approve	13%	8%	12%	10%	19%	11%	12%	13%	11%	13%	14%	11%
Somewhat approve	24%	14%	22%	25%	29%	23%	23%	25%	20%	25%	26%	23%
Somewhat disapprove	11%	17%	12%	11%	8%	14%	11%	10%	10%	10%	12%	13%
Strongly disapprove	41%	36%	38%	46%	38%	36%	44%	45%	50%	43%	35%	41%
Not sure	11%	25%	15%	8%	5%	16%	9%	7%	10%	9%	12%	12%
Totals	100%	100%	99%	100%	99%	100%	99%	100%	101%	100%	99%	100%
Unweighted N	(1,492)	(187)	(307)	(611)	(387)	(518)	(439)	(371)	(243)	(371)	(496)	(382)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Strongly approve	13%	2%	27%	2%	9%	29%	2%	8%	27%
Somewhat approve	24%	4%	46%	7%	26%	41%	5%	22%	42%
Somewhat disapprove	11%	10%	11%	12%	12%	10%	8%	14%	12%
Strongly disapprove	41%	79%	6%	72%	38%	8%	82%	44%	6%
Not sure	11%	5%	10%	7%	15%	13%	3%	12%	13%
Totals	100%	100%	100%	100%	100%	101%	100%	100%	100%
Unweighted N	(1,492)	(799)	(595)	(604)	(426)	(462)	(482)	(489)	(481)

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70. Approval of the Supreme Court of the United States

Do you approve or disapprove of the way the Supreme Court of the United States is handling its job?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Strongly approve	16%	17%	14%	21%	16%	17%	13%	11%	13%
Somewhat approve	40%	41%	39%	44%	42%	36%	46%	35%	37%
Somewhat disapprove	22%	23%	21%	18%	25%	22%	18%	24%	18%
Strongly disapprove	9%	10%	8%	8%	12%	7%	6%	11%	11%
Not sure	14%	9%	19%	9%	5%	18%	17%	19%	20%
Totals	101%	100%	101%	100%	100%	100%	100%	100%	99%
Unweighted N	(1,492)	(680)	(812)	(324)	(208)	(382)	(232)	(150)	(109)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Strongly approve	16%	11%	14%	15%	20%	15%	17%	14%	13%	15%	16%	16%
Somewhat approve	40%	32%	37%	42%	43%	40%	39%	40%	38%	40%	42%	37%
Somewhat disapprove	22%	24%	17%	24%	21%	18%	24%	27%	23%	23%	19%	24%
Strongly disapprove	9%	11%	11%	8%	7%	9%	8%	8%	8%	9%	8%	11%
Not sure	14%	23%	20%	11%	9%	17%	11%	11%	18%	14%	15%	11%
Totals	101%	101%	99%	100%	100%	99%	99%	100%	100%	101%	100%	99%
Unweighted N	(1,492)	(188)	(306)	(611)	(387)	(521)	(436)	(371)	(243)	(370)	(496)	(383)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Strongly approve	16%	8%	27%	7%	12%	28%	5%	13%	26%
Somewhat approve	40%	31%	50%	33%	42%	45%	31%	42%	46%
Somewhat disapprove	22%	32%	12%	28%	22%	13%	33%	22%	13%
Strongly disapprove	9%	16%	2%	17%	6%	2%	20%	7%	2%
Not sure	14%	14%	10%	15%	18%	11%	11%	16%	13%
Totals	101%	101%	101%	100%	100%	99%	100%	100%	100%
Unweighted N	(1,492)	(797)	(597)	(602)	(427)	(463)	(482)	(487)	(482)

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71. Ideology of the Supreme Court of the United States

In general, how would you describe the political viewpoint of the Supreme Court of the United States?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Very liberal	2%	2%	2%	1%	1%	2%	1%	3%	9%
Liberal	7%	7%	7%	7%	8%	7%	10%	4%	4%
Moderate	29%	31%	28%	41%	31%	27%	27%	25%	27%
Conservative	32%	36%	29%	35%	37%	29%	37%	27%	21%
Very conservative	16%	17%	14%	11%	22%	11%	14%	22%	19%
Not sure	13%	6%	20%	5%	1%	23%	12%	19%	20%
Totals	99%	99%	100%	100%	100%	99%	101%	100%	100%
Unweighted N	(1,495)	(680)	(815)	(324)	(209)	(382)	(235)	(149)	(109)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Very liberal	2%	4%	4%	1%	1%	3%	1%	2%	0%	2%	3%	2%
Liberal	7%	6%	7%	9%	6%	7%	7%	9%	7%	4%	10%	7%
Moderate	29%	27%	35%	25%	33%	31%	30%	28%	31%	30%	30%	28%
Conservative	32%	28%	26%	38%	31%	25%	34%	39%	34%	35%	28%	35%
Very conservative	16%	14%	14%	17%	16%	14%	16%	17%	14%	16%	16%	15%
Not sure	13%	21%	14%	11%	13%	20%	12%	5%	14%	14%	13%	13%
Totals	99%	100%	100%	101%	100%	100%	100%	100%	100%	101%	100%	100%
Unweighted N	(1,495)	(188)	(307)	(611)	(389)	(519)	(439)	(373)	(244)	(370)	(497)	(384)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Very liberal	2%	3%	1%	5%	0%	1%	6%	0%	1%
Liberal	7%	3%	12%	5%	7%	11%	4%	5%	12%
Moderate	29%	14%	45%	14%	38%	40%	10%	39%	38%
Conservative	32%	41%	25%	37%	26%	31%	43%	28%	30%
Very conservative	16%	31%	3%	29%	11%	5%	34%	12%	5%
Not sure	13%	8%	13%	11%	18%	13%	3%	16%	14%
Totals	99%	100%	99%	101%	100%	101%	100%	100%	100%
Unweighted N	(1,495)	(799)	(598)	(605)	(425)	(465)	(484)	(489)	(483)

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72. Trend of Economy

Overall, do you think the economy is getting better or worse?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Getting better	27%	33%	23%	37%	36%	25%	28%	10%	25%
About the same	28%	29%	27%	25%	34%	33%	23%	26%	22%
Getting worse	37%	32%	42%	29%	27%	33%	39%	59%	47%
Not sure	7%	6%	8%	9%	3%	10%	10%	5%	6%
Totals	99%	100%	100%	100%	100%	101%	100%	100%	100%
Unweighted N	(1,497)	(681)	(816)	(324)	(209)	(384)	(235)	(150)	(109)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Getting better	27%	17%	24%	31%	31%	21%	30%	31%	22%	28%	31%	26%
About the same	28%	36%	27%	25%	29%	31%	28%	26%	27%	30%	27%	28%
Getting worse	37%	36%	38%	39%	35%	42%	34%	40%	43%	33%	35%	41%
Not sure	7%	11%	11%	6%	5%	7%	8%	4%	8%	9%	7%	6%
Totals	99%	100%	100%	101%	100%	101%	100%	101%	100%	100%	100%	101%
Unweighted N	(1,497)	(190)	(306)	(612)	(389)	(520)	(439)	(373)	(243)	(373)	(496)	(385)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Getting better	27%	7%	53%	8%	26%	50%	7%	19%	52%
About the same	28%	26%	26%	27%	29%	28%	24%	33%	27%
Getting worse	37%	61%	15%	60%	33%	16%	63%	39%	15%
Not sure	7%	6%	6%	5%	13%	6%	6%	9%	5%
Totals	99%	100%	100%	100%	101%	100%	100%	100%	99%
Unweighted N	(1,497)	(801)	(598)	(605)	(426)	(466)	(483)	(489)	(482)

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73. Stock Market Expectations Over Next Year

Do you think the stock market will be higher or lower 12 months from now?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Higher	25%	28%	22%	24%	30%	20%	23%	26%	25%
About the same	20%	20%	20%	17%	21%	17%	19%	29%	27%
Lower	28%	28%	28%	35%	31%	29%	29%	14%	27%
Not sure	27%	23%	30%	24%	18%	34%	29%	30%	21%
Totals	100%	99%	100%	100%	100%	100%	100%	99%	100%
Unweighted N	(1,496)	(682)	(814)	(324)	(209)	(383)	(235)	(148)	(110)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Higher	25%	27%	23%	26%	24%	22%	24%	31%	23%	28%	22%	28%
About the same	20%	30%	26%	16%	16%	26%	22%	16%	21%	22%	17%	23%
Lower	28%	20%	24%	29%	34%	26%	25%	32%	26%	28%	31%	25%
Not sure	27%	23%	28%	29%	26%	26%	28%	22%	30%	23%	29%	25%
Totals	100%	100%	101%	100%	100%	100%	99%	101%	100%	101%	99%	101%
Unweighted N	(1,496)	(189)	(306)	(612)	(389)	(519)	(439)	(373)	(244)	(371)	(496)	(385)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Higher	25%	35%	17%	36%	19%	17%	38%	23%	18%
About the same	20%	24%	13%	24%	21%	15%	20%	27%	15%
Lower	28%	13%	45%	13%	28%	45%	14%	26%	42%
Not sure	27%	27%	25%	27%	32%	22%	28%	24%	25%
Totals	100%	99%	100%	100%	100%	99%	100%	100%	100%
Unweighted N	(1,496)	(799)	(599)	(604)	(427)	(465)	(484)	(488)	(482)

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74. Change in Personal Finances Over Past Year

Would you say that you and your family are...

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Better off financially than you were a year ago	27%	32%	23%	36%	32%	23%	28%	17%	16%
About the same financially as you were a year ago	46%	46%	47%	42%	49%	47%	48%	45%	51%
Worse off financially than you were a year ago	24%	21%	27%	20%	18%	26%	20%	34%	28%
Not sure	3%	2%	3%	2%	1%	3%	3%	3%	4%
Totals	100%	101%	100%	100%	100%	99%	99%	99%	99%
Unweighted N	(1,497)	(682)	(815)	(324)	(209)	(382)	(235)	(149)	(111)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Better off financially than you were a year ago	27%	17%	31%	30%	24%	18%	27%	38%	20%	27%	30%	27%
About the same financially as you were a year ago	46%	52%	41%	41%	55%	46%	50%	42%	52%	48%	41%	48%
Worse off financially than you were a year ago	24%	25%	24%	28%	19%	32%	21%	18%	25%	23%	25%	24%
Not sure	3%	6%	4%	1%	1%	4%	1%	1%	4%	2%	3%	2%
Totals	100%	100%	100%	100%	99%	100%	99%	99%	101%	100%	99%	101%
Unweighted N	(1,497)	(190)	(306)	(612)	(389)	(520)	(439)	(373)	(244)	(371)	(498)	(384)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Better off financially than you were a year ago	27%	15%	43%	16%	23%	42%	19%	21%	40%
About the same financially as you were a year ago	46%	47%	44%	48%	48%	43%	46%	47%	47%
Worse off financially than you were a year ago	24%	36%	11%	34%	26%	12%	32%	31%	11%
Not sure	3%	2%	2%	2%	3%	3%	3%	1%	2%
Totals	100%	100%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,497)	(800)	(599)	(606)	(426)	(465)	(482)	(489)	(484)

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75. Jobs in Six Months

Six months from now do you think there will be...

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
More jobs	26%	30%	23%	26%	30%	20%	31%	29%	16%
The same amount of jobs	24%	22%	25%	18%	24%	24%	17%	35%	32%
Fewer jobs	29%	31%	27%	37%	33%	27%	28%	16%	31%
Not sure	21%	17%	25%	19%	13%	29%	24%	20%	21%
Totals	100%	100%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,496)	(680)	(816)	(324)	(209)	(383)	(235)	(149)	(109)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
More jobs	26%	27%	18%	28%	30%	24%	26%	29%	27%	29%	22%	30%
The same amount of jobs	24%	31%	31%	20%	18%	28%	25%	21%	24%	25%	22%	26%
Fewer jobs	29%	24%	30%	29%	30%	27%	29%	30%	26%	28%	34%	23%
Not sure	21%	17%	22%	23%	22%	20%	20%	19%	23%	19%	23%	21%
Totals	100%	99%	101%	100%	100%	99%	100%	99%	100%	101%	101%	100%
Unweighted N	(1,496)	(188)	(306)	(613)	(389)	(520)	(439)	(373)	(244)	(371)	(497)	(384)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
More jobs	26%	38%	16%	35%	23%	19%	37%	28%	17%
The same amount of jobs	24%	24%	16%	28%	22%	21%	26%	24%	22%
Fewer jobs	29%	17%	44%	18%	30%	40%	16%	29%	40%
Not sure	21%	21%	23%	20%	26%	20%	22%	19%	21%
Totals	100%	100%	99%	101%	101%	100%	101%	100%	100%
Unweighted N	(1,496)	(799)	(599)	(605)	(426)	(465)	(483)	(489)	(483)

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76. Worried about Losing Job

How worried are you about losing your job?

		Gender		White Men		White Women		Race	
	Total	Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Very worried	9%	9%	9%	7%	7%	7%	5%	15%	19%
Somewhat worried	29%	30%	29%	22%	30%	22%	31%	36%	36%
Not very worried	61%	62%	61%	71%	64%	71%	64%	49%	44%
Totals	99%	101%	99%	100%	101%	100%	100%	100%	99%
Unweighted N	(925)	(457)	(468)	(187)	(162)	(188)	(158)	(92)	(75)

	Age					Income			Region			
	Total	18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Very worried	9%	12%	14%	8%	2%	12%	8%	8%	10%	5%	13%	7%
Somewhat worried	29%	36%	36%	25%	24%	35%	33%	24%	26%	25%	29%	39%
Not very worried	61%	52%	51%	67%	74%	52%	59%	69%	65%	70%	58%	54%
Totals	99%	100%	101%	100%	100%	99%	100%	101%	101%	100%	100%	100%
Unweighted N	(925)	(133)	(240)	(415)	(137)	(267)	(287)	(286)	(169)	(234)	(293)	(229)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Very worried	9%	10%	8%	11%	8%	7%	11%	12%	5%
Somewhat worried	29%	33%	23%	32%	31%	25%	29%	33%	26%
Not very worried	61%	57%	69%	57%	60%	68%	60%	55%	69%
Totals	99%	100%	100%	100%	99%	100%	100%	100%	100%
Unweighted N	(925)	(496)	(368)	(367)	(287)	(271)	(305)	(304)	(290)

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77. Job Availability

If you lost your job, how hard would it be for you to find a new job that paid as much as you are making now?

		Gender		White Men		White Women		Race	
	Total	Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Very hard – I would probably have to take a pay cut.	32%	34%	30%	36%	40%	24%	27%	25%	41%
Somewhat hard – It might take a while before I found a job that paid as much.	38%	40%	37%	40%	35%	42%	40%	30%	40%
Not very hard	21%	18%	23%	17%	18%	28%	23%	21%	14%
Not sure	9%	8%	10%	7%	8%	6%	10%	24%	5%
Totals	100%	100%	100%	100%	101%	100%	100%	100%	100%
Unweighted N	(925)	(457)	(468)	(187)	(162)	(187)	(158)	(92)	(76)

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	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Very hard – I would probably have to take a pay cut.	32%	24%	33%	35%	32%	34%	33%	32%	28%	33%	33%	34%
Somewhat hard – It might take a while before I found a job that paid as much.	38%	39%	43%	38%	30%	34%	42%	41%	44%	34%	35%	43%
Not very hard	21%	24%	18%	19%	24%	20%	19%	20%	19%	26%	20%	17%
Not sure	9%	13%	6%	8%	14%	12%	7%	7%	10%	7%	12%	7%
Totals	100%	100%	100%	100%	100%	100%	101%	100%	101%	100%	100%	101%
Unweighted N	(925)	(132)	(241)	(415)	(137)	(268)	(287)	(286)	(169)	(233)	(294)	(229)

	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Very hard – I would probably have to take a pay cut.	32%	33%	32%	30%	38%	29%	31%	38%	28%
Somewhat hard – It might take a while before I found a job that paid as much.	38%	36%	35%	39%	37%	38%	39%	40%	37%
Not very hard	21%	19%	26%	20%	15%	27%	18%	17%	28%
Not sure	9%	11%	7%	11%	9%	6%	12%	5%	8%
Totals	100%	99%	100%	100%	99%	100%	100%	100%	101%
Unweighted N	(925)	(497)	(368)	(368)	(287)	(270)	(306)	(304)	(290)

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78. Happy with Job

How happy would you say you are with your current job?

	Gender			White Men		White Women		Race	
	Total	Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Very happy	26%	27%	25%	26%	29%	26%	27%	20%	23%
Happy	38%	37%	38%	36%	41%	39%	43%	28%	36%
Neither happy nor unhappy	26%	25%	27%	26%	22%	28%	20%	37%	29%
Unhappy	7%	6%	7%	6%	5%	5%	7%	10%	8%
Very unhappy	4%	5%	3%	7%	3%	2%	4%	5%	4%
Totals	101%	100%	100%	101%	100%	100%	101%	100%	100%
Unweighted N	(914)	(449)	(465)	(182)	(163)	(187)	(158)	(89)	(74)

	Age					Income			Region			
	Total	18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Very happy	26%	27%	25%	26%	28%	19%	26%	32%	24%	29%	26%	25%
Happy	38%	34%	37%	40%	37%	36%	36%	41%	38%	39%	40%	32%
Neither happy nor unhappy	26%	25%	22%	26%	31%	32%	28%	20%	23%	21%	26%	33%
Unhappy	7%	10%	10%	5%	2%	9%	8%	4%	9%	6%	6%	6%
Very unhappy	4%	4%	5%	3%	2%	4%	2%	3%	6%	4%	3%	3%
Totals	101%	100%	99%	100%	100%	100%	100%	100%	100%	99%	101%	99%
Unweighted N	(914)	(131)	(238)	(411)	(134)	(260)	(285)	(286)	(167)	(232)	(291)	(224)

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	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Very happy	26%	23%	33%	23%	19%	36%	23%	22%	35%
Happy	38%	42%	35%	39%	42%	33%	41%	39%	33%
Neither happy nor unhappy	26%	25%	23%	28%	28%	21%	27%	26%	23%
Unhappy	7%	6%	6%	7%	6%	6%	5%	8%	5%
Very unhappy	4%	4%	3%	3%	5%	4%	4%	4%	3%
Totals	101%	100%	100%	100%	100%	100%	100%	99%	99%
Unweighted N	(914)	(492)	(363)	(366)	(281)	(267)	(305)	(297)	(287)

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79. Education (2 Category)

What is the highest level of education you have completed?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
No degree	59%	58%	60%	100%	0%	100%	0%	72%	73%
College grad	41%	42%	40%	0%	100%	0%	100%	28%	27%
Totals	100%	100%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,500)	(683)	(817)	(324)	(209)	(384)	(235)	(150)	(111)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
No degree	59%	63%	63%	56%	59%	85%	54%	26%	50%	61%	60%	65%
College grad	41%	37%	37%	44%	41%	15%	46%	74%	50%	39%	40%	35%
Totals	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,500)	(191)	(307)	(613)	(389)	(522)	(439)	(373)	(244)	(373)	(498)	(385)

	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
No degree	59%	51%	58%	58%	57%	62%	52%	60%	63%
College grad	41%	49%	42%	42%	43%	38%	48%	40%	37%
Totals	100%	100%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,500)	(802)	(599)	(607)	(427)	(466)	(484)	(489)	(484)

The Economist/YouGov Poll
November 8 - 10, 2020 - 1500 U.S. Registered Voters



80. Own or Rent Home

Do you own or rent the place you currently live?

	Total	Gender		White Men		White Women		Race	
		Male	Female	No degree	College Grad	No degree	College Grad	Black	Hispanic
Own	65%	66%	65%	61%	81%	73%	76%	39%	54%
Rent	30%	29%	30%	35%	17%	21%	20%	55%	42%
Other	5%	5%	5%	5%	2%	5%	4%	6%	4%
Totals	100%	100%	100%	101%	100%	99%	100%	100%	100%
Unweighted N	(1,496)	(681)	(815)	(324)	(209)	(383)	(235)	(150)	(108)

	Total	Age				Income			Region			
		18-29	30-44	45-64	65+	Under \$50K	\$50-100K	\$100K or more	Northeast	Midwest	South	West
Own	65%	37%	54%	71%	81%	45%	72%	85%	63%	70%	69%	57%
Rent	30%	47%	42%	25%	17%	50%	24%	11%	34%	23%	27%	37%
Other	5%	16%	5%	3%	2%	5%	4%	4%	3%	7%	4%	6%
Totals	100%	100%	101%	99%	100%	100%	100%	100%	100%	100%	100%	100%
Unweighted N	(1,496)	(189)	(306)	(612)	(389)	(521)	(439)	(373)	(243)	(372)	(497)	(384)

The Economist/YouGov Poll
November 8 - 10, 2020 - 1500 U.S. Registered Voters



	Total	2020 Vote		Party ID			Ideology		
		Biden	Trump	Dem	Ind	Rep	Lib	Mod	Con
Own	65%	59%	79%	54%	65%	78%	58%	63%	76%
Rent	30%	35%	18%	41%	29%	17%	35%	33%	20%
Other	5%	6%	3%	5%	6%	4%	7%	3%	4%
Totals	100%	100%	100%	100%	100%	99%	100%	99%	100%
Unweighted N	(1,496)	(800)	(599)	(604)	(427)	(465)	(482)	(489)	(484)

The Economist/YouGov Poll
November 8 - 10, 2020 - 1500 U.S. Registered Voters



Sponsorship	<i>The Economist</i>
Fieldwork	YouGov
Interviewing Dates	November 8 - 10, 2020
Target population	US Registered Voters
Sampling method	Respondents were selected from YouGov's opt-in Internet panel using sample matching. A random sample (stratified by gender, age, race, education, and region) was selected from the 2016 American Community Study. Voter registration was imputed from the November 2016 Current Population Survey Registration and Voting Supplement.
Weighting	The sample was weighted based on gender, age, race, education, news interest, and 2016 Presidential vote (or non-vote). The weights range from 0.052 to 5.171, with a mean of one and a standard deviation of 0.76.
Number of respondents	1500
Margin of error	± 3.2% (adjusted for weighting)
Survey mode	Web-based interviews
Questions not reported	44 questions not reported.

Exhibit 73



PRESS RELEASE

Most Americans agree Joe Biden is rightful winner of 2020 election

Latest Reuters/Ipsos poll shows most approve of how Joe Biden is handling his position of President-elect

Topline Findings

Washington, DC, November 18, 2020 – In the latest public opinion poll from Reuters/Ipsos, three-fourths of Americans (73%) believe that Joe Biden has won the presidential election based on what they know or have heard. Five percent believe Donald Trump has won and another 18% believe the election has not yet been called. When asked who has *rightfully* won the election, 63% of Americans believe Joe Biden has, including 95% of Democrats, 29% of Republicans, and 60% of independents. Fifty-four percent of Americans say that Joe Biden is acting responsibly by claiming victory compared to just 31% who say he is acting irresponsibly. However, only 20% of Americans agree that Donald Trump, who has also claimed victory, is acting responsibly in doing so. Seven out of ten (69%) think he is acting irresponsibly. A majority of Americans believe that Donald Trump claiming victory early is bad for this country's democracy (55%), only 28% feel the same about Joe Biden's claim. Sixty percent approve of how Joe Biden is handling his job as President-elect while 37% approve of Donald Trump's handling of the presidency. A majority of Americans disapprove of the way Donald Trump is handling the transition process to the Biden administration (60%) with most of those *strongly* disapproving (42%).

Overall, most Americans believe the election was legitimate and accurate (55%). Democrats (86%) are far more likely to hold this belief than Republicans (26%) or independents (49%). On the other hand, Republicans are much more likely to believe the results of the election were fraudulent due to illegal voting or election rigging (59%) compared to just 6% of Democrats and 20% of independents. When asked how the outcome of the election, which has consistently been called for Joe Biden, makes people feel, Democrats report positive emotions such as hopeful (30%), relieved (28%), and happy (18%). Republican responses trend negative: worried (39%), angry (15%), and indifferent (11%). Independents seem to sympathize with both sides feeling indifferent (26%), hopeful (19%), and worried (16%).

As legal challenges from the Trump campaign are ongoing, Americans unanimously agree that all ballots need to be counted, regardless of who was declared winner (87%). Three out of five (61%) trust the electoral college to reflect the will of the American people, backed by bipartisan support.

For full results, please refer to the following annotated questionnaire.



PRESS RELEASE

		All Respondents	Democrats	Republicans	Independents
Do you consider yourself a Democrat, a Republican, an independent or none of these?	Democrat	42%	100%	0%	0%
	Republican	38%	0%	100%	0%
	Independent	12%	0%	0%	100%
	None/DK	8%	0%	0%	0%
	Total	1346	598	496	149
TM1890Y20. Are you currently registered to vote at your current address, or not?	Yes, registered to vote at my current address	82%	87%	89%	74%
	No, not registered to vote at my current address	16%	12%	10%	21%
	Not sure	2%	1%	1%	4%
	Total	1346	598	496	149
S8 / SC8. In your opinion, what is the most important problem facing the U.S. today? (Select from below or write in)	Economy generally	19%	14%	25%	20%
	Unemployment / lack of jobs	8%	8%	7%	7%
	War / foreign conflicts	1%	1%	0%	0%
	Immigration	5%	3%	10%	1%
	Terrorism / terrorist attacks	3%	2%	4%	3%
	Healthcare	20%	28%	11%	23%
	Energy issues	1%	1%	1%	0%
	Morality	8%	6%	10%	6%
	Education	2%	2%	2%	2%
	Crime	6%	5%	7%	2%
	Environment	5%	7%	2%	5%
	Other	19%	20%	18%	23%
	Don't know	5%	3%	2%	9%
	Total	1346	598	496	149

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GAME CHANGERS 



PRESS RELEASE

		All Respondents	Democrats	Republicans	Independents
AB1. Generally speaking, would you say things in this country are heading in the right direction, or are they off on the wrong track?	Right direction	23%	18%	33%	13%
	Wrong track	61%	70%	51%	68%
	Don't know	16%	11%	16%	18%
	Total	1346	598	496	149
TM1985Y20. Based on what you know or have heard, what is the result of the recent presidential election?	Donald Trump won	5%	1%	12%	2%
	Joe Biden won	73%	96%	48%	75%
	The election has not been called	18%	3%	36%	16%
	Don't know	5%	1%	5%	7%
	Total	1346	598	496	149
TM1995Y20. Who do you believe rightfully won the 2020 presidential election?	Donald Trump	23%	3%	52%	15%
	Joe Biden	63%	95%	29%	60%
	Not sure	14%	2%	19%	25%
	Total	1346	598	496	149
TM1886Y20_12. It is extremely important to me that all ballots are counted, no matter who was declared winner	Strongly agree	67%	68%	73%	63%
	Somewhat agree	19%	22%	17%	16%
	Somewhat disagree	5%	5%	4%	5%
	Strongly disagree	3%	3%	2%	4%
	Not sure	5%	2%	4%	11%
	Total	1346	598	496	149
TM1886Y20_7. Please indicate how much you agree or disagree with the following statements... I trust election officials in my county or town to do their job honestly	Strongly agree	39%	54%	26%	37%
	Somewhat agree	32%	31%	35%	28%
	Somewhat disagree	13%	7%	17%	15%
	Strongly disagree	9%	4%	15%	9%
	Not sure	7%	4%	7%	11%
	Total	1346	598	496	149

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PRESS RELEASE

		All Respondents	Democrats	Republicans	Independents
TM1886Y20_8. Please indicate how much you agree or disagree with the following statements... I am concerned that the election is rigged	Strongly agree	22%	7%	42%	14%
	Somewhat agree	17%	10%	25%	17%
	Somewhat disagree	17%	18%	14%	21%
	Strongly disagree	37%	62%	13%	30%
	Not sure	7%	3%	6%	17%
	Total	1346	598	496	149
TM1886Y20_9. Please indicate how much you agree or disagree with the following statements... I trust the electoral college to reflect the will of the American people	Strongly agree	28%	33%	25%	25%
	Somewhat agree	33%	32%	36%	29%
	Somewhat disagree	17%	18%	16%	16%
	Strongly disagree	13%	11%	14%	16%
	Not sure	9%	6%	8%	14%
	Total	1346	598	496	149
TM1991Y20_2. How does the outcome of presidential election make you feel?	Worried	22%	9%	39%	16%
	Angry	7%	2%	15%	3%
	Hopeful	19%	30%	8%	19%
	Relieved	15%	28%	4%	9%
	Happy	10%	18%	3%	6%
	Sad	5%	1%	9%	5%
	Indifferent	10%	5%	11%	26%
	Other	3%	1%	5%	4%
	None of these	8%	4%	7%	11%
	Total	1346	598	496	149
TM1082Y16_2. What comes close to your view of the 2020 election? It was...	Legitimate and accurate	55%	86%	26%	49%
	The result of illegal voting or election rigging	28%	6%	59%	20%
	Don't know	17%	7%	15%	30%
	Total	1346	598	496	149

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PRESS RELEASE

		All Respondents	Democrats	Republicans	Independents
TM1045Y16_2. If Joe Biden wins the presidency will you...	Accept the results as legitimate and support his presidency	66%	90%	38%	64%
	Accept the results as legitimate and oppose his presidency	14%	6%	22%	19%
	Not accept the results as legitimate but do nothing	13%	3%	25%	13%
	Not accept the results as legitimate and take action	7%	1%	15%	5%
	Total	1346	598	496	149
TM1046Y16. If Donald Trump wins the presidency will you...	Accept the results as legitimate and support his presidency	49%	19%	82%	46%
	Accept the results as legitimate and oppose his presidency	19%	28%	8%	28%
	Not accept the results as legitimate but do nothing	17%	26%	6%	17%
	Not accept the results as legitimate and take action	15%	27%	5%	9%
	Total	1346	598	496	149
TM1988Y20. Is Donald Trump behaving responsibly or irresponsibly by claiming victory early?	Very responsibly	11%	3%	23%	7%
	Somewhat responsibly	9%	4%	16%	5%
	Somewhat irresponsibly	19%	11%	28%	24%
	Very irresponsibly	49%	79%	19%	47%
	Not sure	11%	4%	14%	18%
	Total	1346	598	496	149

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PRESS RELEASE

		All Respondents	Democrats	Republicans	Independents
TM1984Y20_2. Is Joe Biden behaving responsibly or irresponsibly by claiming victory early?	Very responsibly	34%	60%	10%	27%
	Somewhat responsibly	20%	22%	18%	20%
	Somewhat irresponsibly	15%	7%	24%	16%
	Very irresponsibly	17%	3%	33%	15%
	Not sure	14%	7%	14%	22%
	Total	1346	598	496	149
TM1989Y20. Is Donald Trump claiming victory early good or bad for America's democracy?	Good for America's democracy	17%	8%	33%	7%
	Bad for America's democracy	55%	82%	32%	52%
	Not sure	27%	10%	34%	41%
	Total	1346	598	496	149
TM1989Y20_2. Is Joe Biden claiming victory early good or bad for America's democracy?	Good for America's democracy	41%	71%	16%	26%
	Bad for America's democracy	28%	10%	53%	23%
	Not sure	31%	20%	31%	51%
	Total	1346	598	496	149
AB11_2021. Overall, do you approve or disapprove of the way Joe Biden is handling his job as President-elect?	Strongly approve	37%	68%	8%	27%
	Somewhat approve	20%	20%	19%	25%
	Lean towards approve	4%	3%	5%	5%
	Lean towards disapprove	2%	0%	3%	0%
	Somewhat disapprove	10%	4%	19%	6%
	Strongly disapprove	20%	2%	42%	16%
	Not sure	9%	2%	5%	20%
	Total	1346	598	496	149

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PRESS RELEASE

		All Respondents	Democrats	Republicans	Independents
AB11_2021. Overall, do you approve or disapprove of the way Joe Biden is handling his job as President-elect? - Summary	TOTAL APPROVE	60%	91%	31%	58%
	TOTAL DISAPPROVE	31%	7%	64%	23%
	Not sure	9%	2%	5%	20%
	Total	1346	598	496	149
AB11. Overall, do you approve or disapprove of the way Donald Trump is handling his job as President?	Strongly approve	23%	5%	49%	10%
	Somewhat approve	13%	4%	23%	8%
	Lean towards approve	2%	1%	2%	5%
	Lean towards disapprove	1%	0%	2%	1%
	Somewhat disapprove	13%	15%	10%	21%
	Strongly disapprove	43%	74%	11%	42%
	Not sure	6%	2%	3%	13%
AB11. Overall, do you approve or disapprove of the way Donald Trump is handling his job as President? Summary	TOTAL APPROVE	37%	10%	74%	23%
	TOTAL DISAPPROVE	57%	88%	23%	63%
	Not sure	6%	2%	3%	13%
	Total	1346	598	496	149
TM3. How familiar are you with the following public figures, taking into account all the ways you may have heard about them?...Donald Trump	Very familiar	66%	67%	75%	53%
	Somewhat familiar	25%	22%	22%	36%
	Not very familiar	4%	5%	1%	6%
	Have heard of them, but that's it	3%	3%	1%	4%
	Have not heard about them	2%	2%	1%	1%
	Total	1346	598	496	149

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PRESS RELEASE

		All Respondents	Democrats	Republicans	Independents
TM3. How familiar are you with the following public figures, taking into account all the ways you may have heard about them?...Joe Biden	Very familiar	54%	65%	51%	40%
	Somewhat familiar	34%	28%	38%	45%
	Not very familiar	7%	4%	7%	8%
	Have heard of them, but that's it	5%	2%	3%	7%
	Have not heard about them	1%	1%	0%	0%
	Total	1346	598	496	149
TM3. How familiar are you with the following public figures, taking into account all the ways you may have heard about them?...Kamala Harris	Very familiar	34%	44%	30%	22%
	Somewhat familiar	36%	38%	37%	36%
	Not very familiar	18%	11%	21%	29%
	Have heard of them, but that's it	8%	5%	9%	10%
	Have not heard about them	4%	2%	4%	4%
	Total	1346	598	496	149
TM3. How familiar are you with the following public figures, taking into account all the ways you may have heard about them?...Mike Pence	Very familiar	39%	40%	50%	22%
	Somewhat familiar	36%	35%	35%	45%
	Not very familiar	13%	14%	10%	19%
	Have heard of them, but that's it	8%	7%	4%	13%
	Have not heard about them	3%	3%	2%	1%
	Total	1346	598	496	149
TM4. Would you say you are generally favorable or unfavorable towards these public figures?...Donald Trump	Very favorable	22%	4%	49%	10%
	Somewhat favorable	12%	4%	23%	7%
	Lean towards favorable	10%	4%	10%	17%
	Lean towards unfavorable	8%	7%	7%	14%
	Somewhat unfavorable	8%	9%	4%	11%
	Very unfavorable	40%	72%	7%	42%
	Total	1326	587	492	148

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GAME CHANGERS 



PRESS RELEASE

		All Respondents	Democrats	Republicans	Independents
TM4. Would you say you are generally favorable or unfavorable towards these public figures?...Joe Biden	Very favorable	26%	51%	3%	16%
	Somewhat favorable	18%	29%	9%	16%
	Lean towards favorable	15%	13%	12%	20%
	Lean towards unfavorable	10%	2%	15%	16%
	Somewhat unfavorable	8%	2%	14%	8%
	Very unfavorable	23%	3%	47%	24%
	Total	1334	592	493	149
TM4. Would you say you are generally favorable or unfavorable towards these public figures?...Kamala Harris	Very favorable	23%	46%	2%	12%
	Somewhat favorable	15%	25%	7%	10%
	Lean towards favorable	17%	17%	11%	28%
	Lean towards unfavorable	11%	7%	13%	15%
	Somewhat unfavorable	7%	3%	11%	9%
	Very unfavorable	26%	2%	56%	26%
	Total	1299	588	481	144
TM4. Would you say you are generally favorable or unfavorable towards these public figures?...Mike Pence	Very favorable	20%	3%	45%	9%
	Somewhat favorable	14%	7%	24%	11%
	Lean towards favorable	16%	9%	17%	27%
	Lean towards unfavorable	13%	15%	7%	17%
	Somewhat unfavorable	11%	16%	4%	10%
	Very unfavorable	27%	50%	4%	26%
	Total	1305	585	489	148

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GAME CHANGERS 



PRESS RELEASE

		All Respondents	Democrats	Republicans	Independents
TM1128Y17_1. Do you approve or disapprove of the way Donald Trump is handling the following issues? The US economy	Strongly approve	26%	5%	57%	15%
	Somewhat approve	12%	6%	18%	13%
	Lean towards approve	12%	11%	10%	18%
	Lean towards disapprove	9%	12%	4%	13%
	Somewhat disapprove	10%	14%	3%	9%
	Strongly disapprove	24%	47%	3%	16%
	Don't know	7%	4%	4%	16%
	Total	1346	598	496	149
TM1128Y17_4. Do you approve or disapprove of the way Donald Trump is handling the following issues? Employment and jobs	Strongly approve	27%	5%	58%	14%
	Somewhat approve	11%	6%	16%	14%
	Lean towards approve	13%	12%	14%	14%
	Lean towards disapprove	8%	11%	4%	15%
	Somewhat disapprove	11%	17%	3%	11%
	Strongly disapprove	23%	45%	2%	16%
	Don't know	7%	4%	4%	17%
	Total	1346	598	496	149
TM1128Y17_4. Do you approve or disapprove of the way Donald Trump is handling the following issues? Coronavirus/ COVID-19	Strongly approve	16%	3%	36%	7%
	Somewhat approve	13%	6%	21%	10%
	Lean towards approve	8%	3%	15%	5%
	Lean towards disapprove	8%	6%	8%	12%
	Somewhat disapprove	7%	8%	5%	9%
	Strongly disapprove	43%	73%	11%	43%
	Don't know	5%	2%	4%	13%
	Total	1346	598	496	149

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PRESS RELEASE

		All Respondents	Democrats	Republicans	Independents
TM1128Y17_22. Do you approve or disapprove of the way Donald Trump is handling the following issues? The transition process from the Trump administration to the Biden administration	Strongly approve	11%	4%	22%	5%
	Somewhat approve	6%	4%	11%	3%
	Lean towards approve	8%	4%	11%	9%
	Lean towards disapprove	11%	6%	16%	12%
	Somewhat disapprove	7%	8%	8%	5%
	Strongly disapprove	42%	70%	13%	42%
	Don't know	14%	3%	19%	23%
	Total	1346	598	496	149
TM1350Y17. Of the choices listed below, which is your main source of news about current events and politics? (Select one)	FOX News	16%	10%	26%	8%
	CNN	17%	30%	6%	9%
	MSNBC	5%	9%	2%	6%
	ABC	8%	10%	5%	13%
	CBS	8%	9%	7%	12%
	NBC	9%	10%	10%	5%
	Public Television	4%	5%	3%	3%
	Other	10%	5%	16%	12%
	None of the above	21%	13%	23%	31%
	Total	1346	598	496	149
TM1997Y20. For whom did you vote for President in 2020?	Joe Biden (Democrat)	44%	82%	11%	34%
	Donald Trump (Republican)	32%	4%	74%	18%
	Other	4%	3%	2%	13%
	I did not vote in the 2020 presidential election	16%	10%	11%	27%
	Unsure / Refuse	4%	2%	2%	7%
	Total	1346	598	496	149

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PRESS RELEASE

		All Respondents	Democrats	Republicans	Independents
TM1742Y19 / AB7_2016. For whom did you vote for President in 2016?	Hillary Clinton (Democrat)	32%	64%	6%	19%
	Donald Trump (Republican)	32%	6%	71%	20%
	Other	6%	4%	5%	16%
	I did not vote in the 2016 presidential election	26%	24%	17%	41%
	Unsure / Refuse	4%	2%	2%	4%
	Total	1346	598	496	149

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GAME CHANGERS 



PRESS RELEASE

About the Study

These are some of the findings of an Ipsos poll conducted between November 13-17, 2020 on behalf of Thomson Reuters. For this survey, a sample of 1,346 Americans age 18+ from the continental U.S., Alaska and Hawaii were interviewed online in English. The sample includes 598 Democrats, 496 Republicans and 149 independents. Weighting was then employed to balance demographics to ensure that the sample's composition reflects that of the adult population according to Census data and to provide results intended to approximate the sample universe. The precision of Ipsos online polls is measured using a credibility interval. In this case, the poll is accurate to within ± 3.0 percentage points, 19 times out of 20, had all Americans been polled. The credibility interval will be wider among subsets of the population. All sample surveys and polls may be subject to other sources of error, including, but not limited to coverage error, and measurement error. The poll also has a credibility interval ± 4.6 percentage points for Democrats, ± 5.0 percentage points for Republicans, and ± 9.2 percentage points for independents.

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PRESS RELEASE

About Ipsos

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Exhibit 74



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FOR RELEASE: DECEMBER 10, 2020

**60% VIEW JOE BIDEN’S 2020 PRESIDENTIAL VICTORY AS LEGITIMATE,
QUINNIPIAC UNIVERSITY NATIONAL POLL FINDS;
77% OF REPUBLICANS BELIEVE THERE WAS WIDESPREAD VOTER FRAUD**

Roughly one month after the presidential election, 60 percent of registered voters say they think President-elect Joe Biden’s victory in the 2020 presidential election is legitimate and 34 percent think his win is not legitimate, according to a Quinnipiac (KWIN-uh-pe-ack) University national poll released today.

There are large partisan gaps. Democrats say 98 – 2 percent they think Biden’s election victory is legitimate and independents say 62 – 30 percent his victory is legitimate. Republicans, however, say 70 – 23 percent that they think Biden’s victory is not legitimate.

A majority of voters (58 percent) do not believe there was widespread voter fraud in the 2020 presidential election, while 38 percent say they believe there was widespread fraud. Democrats say 97 – 3 percent they believe there was no widespread voter fraud, independents say 62 – 35 percent they believe there was no widespread voter fraud, and Republicans say 77 – 19 percent they believe there was widespread voter fraud.

“Was the election on the level? ‘No way’ say the vast majority of Republicans. The dearth of Republicans in the House and Senate willing to acknowledge the Biden win is in step with their base,” said Quinnipiac University Polling Analyst Tim Malloy.

THE NEXT FOUR YEARS

More than half of voters (56 percent) say they are generally optimistic about the next four years with Joe Biden as president and 37 percent say they are generally pessimistic. The results are nearly identical to those in 2016 when the same question was posed about then President-elect Donald Trump. In that November 2016 survey, 59 percent said they were optimistic and 37 percent were pessimistic.

A majority of voters (56 percent) say they feel that Joe Biden will do more to unite the country as president, while 39 percent say he will do more to divide the country as president. In November of 2016, voters were split with 47 percent who said Trump would do more to unite the country, and 49 percent who said he would do more to divide the country.

“While Americans are generally optimistic about a post-Trump future, the number of Republicans not willing to embrace the nascent Biden era speaks to the uphill climb the new administration faces the day after Inauguration Day,” said Malloy.

Voters are split in their views about whether the country will unite or remain divided moving forward anytime soon. Nearly half (49 percent) of voters say they view the country as divided but it will unite more in the foreseeable future, while 45 percent say they view the country as divided and believe it will remain that way for the foreseeable future.

POLICY ISSUES

Sixty-one percent of voters say they think the Biden administration should urge states to require that everyone wear masks in public, while 37 percent say it should not do that.

A majority of voters (56 percent) say they support the Biden administration re-joining the Paris Agreement, a global pact reached in 2015 to reduce greenhouse gas emissions to limit climate change, while 38 percent oppose that.

When it comes to restarting the nuclear arms agreement with Iran that was reached during the Obama presidency, 46 percent say they do not want the Biden administration to try and restart the agreement with Iran, while 41 percent say they do want to see that happen.

TRUMP PRESIDENCY

Looking back at the past four years, voters were asked to rate Donald Trump as the President of the United States. More than one quarter (28 percent) rate him as a great president, 19 percent rate him as a good president, 11 percent rate him as a not so good president, and 40 percent rate him as a bad president.

In November of 2016, as President Barack Obama was winding down his time in the Oval Office, 22 percent rated him as a great president, 33 percent rated him as a good president, 23 percent rated him as a not so good president, and 22 percent rated him as a bad president.

When it comes to the way President Trump is handling his job as president today, 44 percent approve and 51 percent disapprove. This is close to his highest job approval rating in April 2020, when 45 percent of voters approved of the job he was doing and 51 percent disapproved.

Today, voters also rated his handling of three issues:

- On his handling of the economy, 52 percent approve and 42 percent disapprove;
- On his handling of foreign policy, 45 percent approve and 49 percent disapprove;
- On his handling of the response to the coronavirus, 39 percent approve and 58 percent disapprove.

THE ECONOMY & JOBS

Half of voters (50 percent) say they think Trump's policies have helped the nation's economy, 30 percent say his policies have hurt it, and 17 percent say his policies have not made a difference.

That is in line with voters' expectations in 2016 after Trump was elected. In November of 2016, 52 percent of voters said they thought Trump's policies would help the nation's economy, 31 percent said they thought his policies would hurt the economy, and 11 percent didn't think his policies would make a difference.

Looking ahead to a Biden presidency, 39 percent say they think Biden's policies will help the economy, 38 percent say his policies will hurt the economy, and 15 percent say his policies won't make a difference.

Forty-three percent of voters rate the economy as either excellent (9 percent) or good (34 percent), while 56 percent rate it as not so good (33 percent) or poor (23 percent). That is slightly improved from June 18, 2020, when 38 percent rated the economy as excellent or good and 61 percent rated it as not so good or poor.

A plurality of voters expect the nation's economy to improve in the near future, as 47 percent say they think the economy will be better in six months and 37 percent say they think it will be worse.

Asked about how difficult it would be to pay for an unexpected bill of one thousand dollars right now, 49 percent say it would be either very difficult (23 percent) or somewhat difficult (26 percent). The same amount, 49 percent, say it would be not so difficult (16 percent) or not difficult at all (33 percent).

"There is hope for an economic upswing... and for people living paycheck to paycheck, it can't come a moment too soon," added Malloy.

When it comes to job opportunities where they live, 46 percent say there are plenty of jobs available in their communities, while 42 percent say job opportunities are difficult to find in their communities.

SATISFACTION

Twenty-five percent of voters say they are either very satisfied (7 percent) or somewhat satisfied (18 percent) with the way things are going in the nation today, while 71 percent say they are either somewhat dissatisfied (25 percent) or very dissatisfied (46 percent) with the way things are going. This compares to July 2020, when 24 percent said they were either very satisfied (7 percent) or somewhat satisfied (17 percent), and 74 percent said they were either somewhat dissatisfied (18 percent) or very dissatisfied (56 percent).

978 self-identified registered voters nationwide were surveyed from December 1st – 7th with a margin of error of +/- 3.1 percentage points.

The Quinnipiac University Poll, directed by Douglas Schwartz, Ph.D., conducts gold standard surveys using random digit dialing with live interviewers calling landlines and cell phones. The Quinnipiac University Poll conducts nationwide surveys and polls in more than twenty states on national and statewide elections, as well as public policy issues.

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Email poll@qu.edu, or follow us on [Twitter](https://twitter.com/QuinnipiacPoll) @QuinnipiacPoll.

1. Do you approve or disapprove of the way Donald Trump is handling his job as president?

	Tot	Rep	Dem	Ind	Men	Wom	WHITE..... 4 YR COLL DEG Wht		
							Yes	No	Evang
Approve	44%	89%	3%	38%	50%	39%	35%	64%	84%
Disapprove	51	9	96	53	44	58	61	34	15
DK/NA	5	2	1	8	6	3	4	3	1
	AGE IN YRS.....				WHITE.....				
	18-34	35-49	50-64	65+	Men	Wom	Wht	Blk	Hsp
Approve	36%	45%	49%	45%	60%	49%	54%	7%	33%
Disapprove	53	50	50	54	37	49	43	86	59
DK/NA	11	5	1	1	3	3	3	7	8

TREND: Do you approve or disapprove of the way Donald Trump is handling his job as president?

	App	Dis	DK/NA
Dec 10, 2020	44	51	5
Jul 15, 2020	36	60	4
Jun 18, 2020	42	55	3
May 20, 2020	42	53	5
Apr 08, 2020	45	51	5
Mar 09, 2020	41	54	5
Feb 10, 2020	43	53	3
Jan 28, 2020	43	52	5
Jan 13, 2020	43	52	5
Dec 16, 2019	43	52	5
See additional trend information on website			

1a. Do you approve or disapprove of the way Donald Trump is handling his job as president?
 COMBINED WITH: (If approve/disapprove q1) Do you strongly or somewhat approve/disapprove?

	Tot	Rep	Dem	Ind	Men	Wom	WHITE..... 4 YR COLL DEG Wht		
							Yes	No	Evang
Approve strongly	36%	79%	3%	28%	39%	34%	30%	53%	70%
Approve smwht	7	10	-	10	10	5	5	10	14
Disapprove smwht	5	3	4	8	5	4	3	4	2
Disapprove strongly	47	6	92	45	39	54	58	30	12
DK/NA	5	2	1	9	7	3	5	3	1

	AGE IN YRS.....				WHITE.....				
	18-34	35-49	50-64	65+	Men	Wom	Wht	Blk	Hsp
Approve strongly	25%	34%	44%	41%	49%	42%	45%	6%	26%
Approve smwht	11	11	5	4	10	7	8	1	7
Disapprove smwht	11	1	3	2	4	3	3	5	11
Disapprove strongly	41	48	47	51	33	46	40	81	48
DK/NA	11	6	1	1	4	3	3	7	8

TREND: Do you approve or disapprove of the way Donald Trump is handling his job as president? COMBINED WITH: (If approve/disapprove) Do you strongly or somewhat approve/disapprove?

	APPROVE.....		DISAPPROVE.....		
	Strngly	Smwht	Smwht	Strngly	DK/NA
Dec 10, 2020	36	7	5	47	5
Jul 15, 2020	25	10	6	54	5
Jun 18, 2020	32	10	6	48	4
May 20, 2020	28	14	7	46	5
Apr 08, 2020	32	13	8	42	5
Mar 09, 2020	30	11	7	47	5
Feb 10, 2020	35	9	6	47	4
Jan 28, 2020	34	8	6	47	5
Jan 13, 2020	34	9	6	46	6
Dec 16, 2019	34	9	5	46	6
See additional trend information on website					

2. Is your opinion of Joe Biden favorable, unfavorable or haven't you heard enough about him?

	Tot	Rep	Dem	Ind	Men	Wom	WHITE..... 4 YR COLL DEG		
							Yes	No	
Favorable	45%	10%	91%	42%	38%	52%	60%	28%	
Unfavorable	44	82	3	42	48	39	35	63	
Hvn't hrd enough	9	7	6	12	11	7	4	7	
REFUSED	2	2	-	5	3	2	1	2	
	AGE IN YRS.....				WHITE.....				
	18-34	35-49	50-64	65+	Men	Wom	Wht	Blk	Hsp
Favorable	39%	45%	47%	51%	32%	46%	39%	69%	50%
Unfavorable	43	43	45	44	57	50	53	14	28
Hvn't hrd enough	15	10	6	4	9	3	6	15	18
REFUSED	4	2	2	-	2	1	1	1	4

TREND: Is your opinion of Joe Biden favorable, unfavorable or haven't you heard enough about him?

	Fav	Unfav	Hvn't HrdEn	REF
Dec 10, 2020	45	44	9	2
Jul 15, 2020	45	43	9	3
Jun 18, 2020	42	46	10	3
May 20, 2020	45	41	12	2
Apr 08, 2020	43	43	12	2
Mar 09, 2020	45	40	12	3
Feb 10, 2020	43	50	5	2
Dec 10, 2019	44	47	7	2
Oct 14, 2019	41	43	14	3
Sep 25, 2019	45	45	9	2
See additional trend information on website				

3. Is your opinion of Donald Trump favorable, unfavorable or haven't you heard enough about him?

	Tot	Rep	Dem	Ind	Men	Wom	WHITE..... 4 YR COLL DEG		
							Yes	No	
Favorable	43%	85%	3%	40%	50%	36%	35%	59%	
Unfavorable	52	12	95	53	45	59	63	36	
Hvn't hrd enough	3	3	1	5	2	4	-	2	
REFUSED	2	-	1	3	3	1	2	3	
	AGE IN YRS.....				WHITE.....				
	18-34	35-49	50-64	65+	Men	Wom	Wht	Blk	Hsp
Favorable	33%	45%	48%	44%	58%	44%	51%	11%	33%
Unfavorable	54	51	51	54	38	52	45	78	61
Hvn't hrd enough	7	2	-	1	1	2	2	9	3
REFUSED	5	3	-	1	3	2	2	2	2

TREND: Is your opinion of Donald Trump favorable, unfavorable or haven't you heard enough about him?

	Fav	Unfav	Hvn't HrdEn	REF
Dec 10, 2020	43	52	3	2
Jul 15, 2020	34	61	3	2
Jun 18, 2020	40	56	2	2
May 20, 2020	40	55	3	3
Apr 08, 2020	41	52	4	3
Mar 09, 2020	39	58	1	2
Feb 10, 2020	42	55	1	2
Dec 10, 2019	40	57	2	2
Oct 14, 2019	39	56	2	3
Sep 25, 2019	38	55	4	3
See additional trend information on website				

6. Do you approve or disapprove of the way Donald Trump is handling - the economy?

	Tot	Rep	Dem	Ind	Men	Wom	WHITE..... 4 YR COLL DEG		
							Yes	No	
Approve	52%	94%	11%	52%	60%	46%	43%	68%	
Disapprove	42	5	83	39	35	49	54	28	
DK/NA	6	1	5	9	6	6	4	5	
	AGE IN YRS.....				WHITE.....				
	18-34	35-49	50-64	65+	Men	Wom	Wht	Blk	Hsp
Approve	51%	52%	56%	50%	66%	53%	59%	23%	49%
Disapprove	40	43	42	44	31	42	36	69	41
DK/NA	9	5	2	6	3	5	4	8	9

TREND: Do you approve or disapprove of the way Donald Trump is handling the economy?

	App	Dis	DK/NA
Dec 10, 2020	52	42	6
Jul 15, 2020	44	53	3
Jun 18, 2020	52	45	3
May 20, 2020	50	47	3
Apr 08, 2020	51	44	5
Mar 09, 2020	54	42	4
Feb 10, 2020	54	42	4
Jan 13, 2020	57	38	5
Dec 10, 2019	54	42	4
Oct 23, 2019	48	48	4
See additional trend information on website			

7. Do you approve or disapprove of the way Donald Trump is handling - foreign policy?

	Tot	Rep	Dem	Ind	Men	Wom	WHITE..... 4 YR COLL DEG		
							Yes	No	
Approve	45%	85%	5%	44%	50%	40%	37%	64%	
Disapprove	49	13	91	46	43	55	58	32	
DK/NA	6	2	4	9	7	5	4	4	
	AGE IN YRS.....				WHITE.....				
	18-34	35-49	50-64	65+	Men	Wom	Wht	Blk	Hsp
Approve	35%	46%	50%	47%	62%	49%	55%	13%	31%
Disapprove	55	48	47	49	34	47	41	76	59
DK/NA	10	6	2	4	4	4	4	12	10

TREND: Do you approve or disapprove of the way Donald Trump is handling foreign policy?

	App	Dis	DK/NA
Dec 10, 2020	45	49	6
Jul 15, 2020	37	59	4
Mar 09, 2020	40	56	4
Feb 10, 2020	43	53	3
Jan 13, 2020	43	53	4
Dec 10, 2019	40	56	4
Oct 23, 2019	35	61	4
Oct 14, 2019	37	57	5
Sep 25, 2019	37	57	6
Aug 28, 2019	38	56	6
See additional trend information on website			

8. In general, how satisfied are you with the way things are going in the nation today; are you very satisfied, somewhat satisfied, somewhat dissatisfied, or very dissatisfied?

							WHITE..... 4 YR COLL DEG	
	Tot	Rep	Dem	Ind	Men	Wom	Yes	No
Very satisfied	7%	12%	3%	5%	8%	6%	8%	9%
Smwht satisfied	18	25	7	22	21	16	12	19
Smwht dissatisfied	25	22	22	33	27	23	23	24
Very dissatisfied	46	36	68	38	41	52	51	45
DK/NA	3	5	-	1	3	3	6	4

	AGE IN YRS.....				WHITE.....				
	18-34	35-49	50-64	65+	Men	Wom	Wht	Blk	Hsp
Very satisfied	4%	6%	10%	7%	11%	6%	8%	4%	6%
Smwht satisfied	21	19	19	14	17	15	16	17	29
Smwht dissatisfied	38	23	19	23	27	20	23	28	31
Very dissatisfied	35	49	49	53	41	54	48	50	34
DK/NA	3	3	3	4	4	5	5	1	-

TREND: In general, how satisfied are you with the way things are going in the nation today; are you very satisfied, somewhat satisfied, somewhat dissatisfied, or very dissatisfied?

	Very sat	Smwht sat	Smwht dis	Very dis	DK/NA
Dec 10, 2020	7	18	25	46	3
Jul 15, 2020	7	17	18	56	1
Jun 18, 2020	7	18	21	50	4
May 20, 2020	10	24	22	42	2
Dec 10, 2019	12	27	26	34	2
Oct 23, 2019	9	24	26	38	2
Sep 25, 2019	15	25	22	37	2
Aug 28, 2019	14	22	22	39	3
Jan 15, 2019	10	27	23	39	1
Dec 18, 2018	13	28	22	35	2

See additional trend information on website

9. Do you think that Joe Biden's victory in the 2020 presidential election is legitimate or not legitimate?

							WHITE..... 4 YR COLL DEG	
	Tot	Rep	Dem	Ind	Men	Wom	Yes	No
Legitimate	60%	23%	98%	62%	55%	63%	69%	40%
Not legitimate	34	70	2	30	36	33	26	53
DK/NA	6	7	1	7	9	3	5	8

	AGE IN YRS.....				WHITE.....				
	18-34	35-49	50-64	65+	Men	Wom	Wht	Blk	Hsp
Legitimate	69%	56%	58%	58%	47%	52%	50%	90%	77%
Not legitimate	24	36	37	39	45	42	44	8	18
DK/NA	6	9	5	4	8	5	7	2	4

10. Do you believe there was widespread voter fraud in the 2020 presidential election, or not?

							WHITE..... 4 YR COLL DEG		
	Tot	Rep	Dem	Ind	Men	Wom	Yes	No	
Yes/Believe	38%	77%	3%	35%	40%	36%	30%	58%	
No	58	19	97	62	54	62	68	39	
DK/NA	3	5	-	3	5	2	3	3	
	AGE IN YRS.....				WHITE.....				
	18-34	35-49	50-64	65+	Men	Wom	Wht	Blk	Hsp
Yes/Believe	32%	38%	41%	41%	50%	47%	48%	9%	20%
No	64	57	56	58	46	52	49	91	72
DK/NA	4	5	3	2	4	2	3	-	7

11. Are you generally optimistic or pessimistic about the next four years with Joe Biden as president?

							WHITE..... 4 YR COLL DEG		
	Tot	Rep	Dem	Ind	Men	Wom	Yes	No	
Optimistic	56%	22%	93%	60%	52%	60%	60%	42%	
Pessimistic	37	69	5	32	42	33	34	52	
DK/NA	7	9	2	8	7	7	6	6	
	AGE IN YRS.....				WHITE.....				
	18-34	35-49	50-64	65+	Men	Wom	Wht	Blk	Hsp
Optimistic	61%	54%	55%	55%	45%	51%	48%	85%	69%
Pessimistic	28	41	42	39	49	42	45	10	21
DK/NA	11	5	4	6	6	8	7	5	10

12. Which comes closer to your point of view: the United States is a divided country and will remain that way for the foreseeable future, or the United States is a divided country but will unite more in the foreseeable future?

							WHITE..... 4 YR COLL DEG		
	Tot	Rep	Dem	Ind	Men	Wom	Yes	No	
Divided/Will remain	45%	60%	25%	48%	54%	38%	53%	48%	
Divided/Will unite	49	32	73	46	40	57	42	44	
DK/NA	6	8	2	6	6	5	6	8	
	AGE IN YRS.....				WHITE.....				
	18-34	35-49	50-64	65+	Men	Wom	Wht	Blk	Hsp
Divided/Will remain	44%	53%	44%	43%	57%	43%	50%	24%	40%
Divided/Will unite	53	42	49	51	35	50	43	75	58
DK/NA	4	6	7	6	8	6	7	1	2

13. How would you rate Donald Trump as the President of the United States; would you say that he has been a great president, a good president, a not so good president, or a bad president?

							WHITE..... 4 YR COLL DEG		
	Tot	Rep	Dem	Ind	Men	Wom	Yes	No	
Great	28%	62%	1%	20%	28%	28%	20%	41%	
Good	19	29	2	24	26	14	17	25	
Not so good	11	4	13	17	13	10	8	6	
Bad	40	5	83	38	33	48	54	27	
DK/NA	1	-	-	1	1	1	1	-	
	AGE IN YRS.....				WHITE.....				
	18-34	35-49	50-64	65+	Men	Wom	Wht	Blk	Hsp
Great	19%	25%	33%	31%	36%	33%	35%	4%	20%
Good	23	23	18	15	28	17	22	5	16
Not so good	22	9	6	9	7	6	7	30	19
Bad	35	40	43	44	29	42	36	59	43
DK/NA	1	2	-	-	-	1	-	2	2

14. Do you think President Trump's policies have helped the nation's economy, hurt the nation's economy, or haven't made a difference?

							WHITE..... 4 YR COLL DEG		
	Tot	Rep	Dem	Ind	Men	Wom	Yes	No	
Helped	50%	92%	10%	48%	58%	43%	41%	66%	
Hurt	30	4	63	25	22	36	40	19	
No difference	17	3	24	23	17	17	16	12	
DK/NA	3	1	3	4	3	3	3	2	
	AGE IN YRS.....				WHITE.....				
	18-34	35-49	50-64	65+	Men	Wom	Wht	Blk	Hsp
Helped	50%	50%	52%	50%	65%	52%	58%	19%	45%
Hurt	23	32	30	33	21	32	26	55	22
No difference	23	17	16	12	13	13	13	22	30
DK/NA	4	1	2	5	1	3	2	3	3
	REGION.....				ANNUAL HOUSEHOLD INCOME...				
	NEast	MWest	South	West	<30K	30-50	50-100	>100K	
Helped	45%	56%	52%	47%	40%	51%	56%	47%	
Hurt	32	27	28	32	35	30	28	31	
No difference	20	13	17	18	19	17	14	19	
DK/NA	3	4	3	3	5	2	2	2	

TREND: Do you think President Trump's policies have helped the nation's economy, hurt the nation's economy, or haven't made a difference? (Note: Prior to December 10, 2020, question was in present tense; prior Nov 22, 2017, question was in future tense)

	Help	Hurt	NoDiff	DK/NA
Dec 10, 2020	50	30	17	3
Aug 28, 2019	37	41	20	2
Jan 15, 2019	40	37	20	2
Dec 18, 2018	43	30	25	2
Jan 10, 2018	37	29	30	4
Nov 22, 2017	36	31	30	4
Jan 26, 2017	44	36	14	6
Jan 10, 2017	47	31	17	5
Nov 22, 2016	52	31	11	6

15. Do you think Joe Biden's policies will help the nation's economy, hurt the nation's economy, or won't make a difference?

							WHITE..... 4 YR COLL DEG		
	Tot	Rep	Dem	Ind	Men	Wom	Yes	No	
Help	39%	8%	81%	34%	30%	48%	46%	25%	
Hurt	38	75	3	33	43	33	31	55	
No difference	15	12	11	22	19	12	15	11	
DK/NA	8	5	5	11	9	7	7	9	
	AGE IN YRS.....				WHITE.....				
	18-34	35-49	50-64	65+	Men	Wom	Wht	Blk	Hsp
Help	31%	40%	42%	45%	24%	39%	32%	74%	40%
Hurt	31	38	42	40	53	41	47	8	27
No difference	27	16	13	7	14	11	13	11	26
DK/NA	11	7	3	9	9	8	9	8	7
	REGION.....				ANNUAL HOUSEHOLD INCOME...				
	NEast	MWest	South	West	<30K	30-50	50-100	>100K	
Help	43%	34%	38%	41%	49%	37%	36%	41%	
Hurt	31	41	40	38	23	39	46	36	
No difference	16	17	16	11	19	15	13	17	
DK/NA	9	9	6	10	9	10	5	6	

16. As president, do you think Joe Biden will take the nation in the right direction or the wrong direction?

							WHITE..... 4 YR COLL DEG		
	Tot	Rep	Dem	Ind	Men	Wom	Yes	No	
Right direction	52%	14%	95%	54%	46%	58%	61%	34%	
Wrong direction	41	81	3	39	46	37	34	60	
DK/NA	6	5	2	8	8	5	5	6	
	AGE IN YRS.....				WHITE.....				
	18-34	35-49	50-64	65+	Men	Wom	Wht	Blk	Hsp
Right direction	56%	48%	51%	54%	38%	48%	43%	85%	64%
Wrong direction	35	43	46	41	56	46	51	10	26
DK/NA	9	9	3	4	6	6	6	5	10

17. Do you feel that Joe Biden will do more to unite the country as president, or will do more to divide the country as president?

							WHITE..... 4 YR COLL DEG		
	Tot	Rep	Dem	Ind	Men	Wom	Yes	No	
Unite	56%	17%	95%	61%	50%	61%	65%	38%	
Divide	39	76	3	35	43	36	30	58	
DK/NA	5	7	2	4	7	3	5	4	
	AGE IN YRS.....				WHITE.....				
	18-34	35-49	50-64	65+	Men	Wom	Wht	Blk	Hsp
Unite	62%	52%	53%	56%	42%	51%	47%	89%	66%
Divide	34	40	43	40	52	46	49	9	28
DK/NA	3	8	5	4	6	4	5	2	6

18. Would you describe the state of the nation's economy these days as excellent, good, not so good, or poor?

							WHITE..... 4 YR COLL DEG		
	Tot	Rep	Dem	Ind	Men	Wom	Yes	No	
Excellent	9%	18%	1%	7%	9%	8%	7%	11%	
Good	34	48	16	37	38	30	30	41	
Not so good	33	23	43	34	32	35	30	31	
Poor	23	10	40	21	19	27	31	16	
DK/NA	1	1	-	1	1	1	2	-	
	AGE IN YRS.....				WHITE.....				
	18-34	35-49	50-64	65+	Men	Wom	Wht	Blk	Hsp
Excellent	9%	8%	11%	8%	10%	9%	10%	4%	11%
Good	32	37	35	32	41	33	37	24	26
Not so good	43	26	30	38	29	32	31	40	40
Poor	16	29	23	21	19	25	22	29	22
DK/NA	1	1	1	1	1	1	1	2	1

	REGION.....				ANNUAL HOUSEHOLD INCOME...			
	NEast	MWest	South	West	<30K	30-50	50-100	>100K
Excellent	7%	9%	11%	5%	6%	8%	11%	7%
Good	33	38	33	33	20	32	38	40
Not so good	36	33	33	31	44	40	28	29
Poor	23	18	22	30	28	20	23	24
DK/NA	1	2	1	1	2	1	-	1

TREND: Would you describe the state of the nation's economy these days as excellent, good, not so good, or poor?

	Exclnt	Good	Not so Good	Poor	DK/NA
Dec 10, 2020	9	34	33	23	1
Jun 18, 2020	8	30	33	28	2
May 20, 2020	3	20	35	39	2
Apr 08, 2020	10	21	35	31	3
Mar 09, 2020	22	44	23	10	1
Feb 10, 2020	25	45	21	8	2
Dec 16, 2019	26	47	19	6	2
Dec 10, 2019	22	47	22	8	2
Oct 23, 2019	17	44	26	10	2
Sep 25, 2019	16	43	28	11	2

See additional trend information on website

19. Do you think the nation's economy will be better or worse in six months?

	Tot	Rep	Dem	Ind	Men	Wom	WHITE..... 4 YR COLL DEG		
							Yes	No	
Better	47%	26%	72%	44%	48%	46%	54%	34%	
Worse	37	53	19	36	38	36	32	47	
NEITHER(VOL)	4	5	2	6	4	5	6	4	
DK/NA	12	15	7	13	10	14	9	15	
	AGE IN YRS.....				WHITE.....				
	18-34	35-49	50-64	65+	Men	Wom	Wht	Blk	Hsp
Better	48%	42%	50%	46%	42%	40%	41%	69%	54%
Worse	40	43	32	32	41	43	42	20	31
NEITHER(VOL)	5	2	5	5	5	5	5	1	6
DK/NA	7	13	12	16	12	13	12	11	8
	REGION.....				ANNUAL HOUSEHOLD INCOME...				
	NEast	MWest	South	West	<30K	30-50	50-100	>100K	
Better	51%	45%	46%	46%	55%	41%	46%	51%	
Worse	34	41	34	40	35	38	39	35	
NEITHER(VOL)	3	3	5	5	3	6	4	4	
DK/NA	13	11	15	9	8	14	11	9	

20. Thinking now about job opportunities where you live, would you say there are plenty of jobs available in your community, or are jobs difficult to find?

							WHITE..... 4 YR COLL DEG		
	Tot	Rep	Dem	Ind	Men	Wom	Yes	No	
Plenty available	46%	64%	29%	47%	49%	43%	37%	54%	
Difficult to find	42	26	57	42	39	46	44	39	
NEITHER(VOL)	3	2	3	3	2	3	6	1	
DK/NA	9	7	12	8	9	8	12	7	
	AGE IN YRS.....				WHITE.....				
	18-34	35-49	50-64	65+	Men	Wom	Wht	Blk	Hsp
Plenty available	53%	46%	49%	42%	53%	43%	48%	31%	55%
Difficult to find	40	45	41	41	36	46	41	58	36
NEITHER(VOL)	2	3	3	3	2	4	3	3	-
DK/NA	5	6	7	14	9	8	9	8	9
	REGION.....				ANNUAL HOUSEHOLD INCOME...				
	NEast	MWest	South	West	<30K	30-50	50-100	>100K	
Plenty available	37%	55%	50%	39%	31%	49%	49%	53%	
Difficult to find	48	36	40	47	61	42	38	37	
NEITHER(VOL)	2	2	3	3	1	1	2	4	
DK/NA	13	7	6	12	7	8	11	7	

21. How difficult would it be for you to pay an unexpected bill of one thousand dollars right away: very difficult, somewhat difficult, not so difficult, or not difficult at all?

							WHITE..... 4 YR COLL DEG		
	Tot	Rep	Dem	Ind	Men	Wom	Yes	No	
Very difficult	23%	19%	25%	28%	21%	26%	8%	22%	
Somewhat difficult	26	31	28	22	25	28	18	27	
Not so difficult	16	17	16	14	16	16	20	18	
Not difficult at all	33	32	30	34	37	29	53	32	
DK/NA	2	1	-	2	2	2	1	1	
	AGE IN YRS.....				WHITE.....				
	18-34	35-49	50-64	65+	Men	Wom	Wht	Blk	Hsp
Very difficult	30%	29%	19%	13%	14%	21%	18%	45%	27%
Somewhat difficult	34	25	21	27	23	25	24	30	35
Not so difficult	11	12	21	20	18	20	19	10	11
Not difficult at all	25	34	39	37	44	34	39	15	24
DK/NA	-	-	-	3	1	1	1	-	3
	REGION.....				ANNUAL HOUSEHOLD INCOME...				
	NEast	MWest	South	West	<30K	30-50	50-100	>100K	
Very difficult	18%	21%	28%	22%	57%	39%	16%	5%	
Somewhat difficult	19	27	24	36	31	33	24	18	
Not so difficult	22	14	15	13	7	10	21	20	
Not difficult at all	39	36	31	27	5	17	38	58	
DK/NA	2	1	2	2	-	-	-	-	

24. Do you approve or disapprove of the way Donald Trump is handling the response to the coronavirus?

							WHITE..... 4 YR COLL DEG		
	Tot	Rep	Dem	Ind	Men	Wom	Yes	No	
Approve	39%	78%	3%	35%	44%	35%	32%	59%	
Disapprove	58	18	96	63	52	64	67	39	
DK/NA	2	3	-	2	3	1	1	2	
	AGE IN YRS.....				WHITE.....				
	18-34	35-49	50-64	65+	Men	Wom	Wht	Blk	Hsp
Approve	29%	39%	46%	43%	55%	45%	50%	6%	26%
Disapprove	70	58	52	55	43	54	49	93	68
DK/NA	1	3	2	2	2	2	2	1	5
	REGION.....				DENSITY.....				
	NEast	MWest	South	West	City	Suburb	Rural		
Approve	37%	44%	40%	37%	29%	37%	56%		
Disapprove	60	53	59	61	69	61	42		
DK/NA	4	3	1	2	2	2	2		

TREND: Do you approve or disapprove of the way Donald Trump is handling the response to the coronavirus?

	App	Dis	DK/NA
Dec 10, 2020	39	58	2
Jul 15, 2020	35	62	3
Jun 18, 2020	42	56	2
May 20, 2020	41	56	3
Apr 08, 2020	46	51	3
Mar 09, 2020	43	49	8

27. Do you think the Biden administration should urge states to require that everyone wear masks in public, or not?

							WHITE..... 4 YR COLL DEG		
	Tot	Rep	Dem	Ind	Men	Wom	Yes	No	
Yes	61%	34%	94%	62%	54%	67%	65%	49%	
No	37	64	6	36	44	31	33	49	
DK/NA	2	2	1	2	2	2	2	2	
	AGE IN YRS.....				WHITE.....				
	18-34	35-49	50-64	65+	Men	Wom	Wht	Blk	Hsp
Yes	68%	57%	58%	67%	47%	61%	54%	84%	73%
No	31	41	40	30	52	36	44	15	24
DK/NA	1	2	2	3	1	3	2	1	3
	REGION.....				DENSITY.....				
	NEast	MWest	South	West	City	Suburb	Rural		
Yes	73%	52%	59%	60%	69%	63%	48%		
No	25	44	39	38	29	35	51		
DK/NA	1	4	2	1	2	2	2		

41. Do you support or oppose the Biden administration re-joining the Paris Agreement, a pact reached among countries around the globe to limit climate change by reducing greenhouse gas emissions?

	Tot	Rep	Dem	Ind	Men	Wom	WHITE..... 4 YR COLL DEG		
							Yes	No	
Support	56%	20%	93%	58%	52%	60%	65%	39%	
Oppose	38	74	5	33	43	33	30	54	
DK/NA	6	5	3	9	5	7	4	7	
	AGE IN YRS.....				WHITE.....				
	18-34	35-49	50-64	65+	Men	Wom	Wht	Blk	Hsp
Support	67%	55%	53%	51%	41%	54%	48%	79%	70%
Oppose	24	39	45	42	52	41	46	11	23
DK/NA	9	6	2	7	6	5	6	9	7

42. Do you believe that Israel was involved in the recent killing of Iran's top nuclear scientist, or not?

	Tot	Rep	Dem	Ind	Men	Wom	WHITE..... 4 YR COLL DEG		
							Yes	No	
Yes	31%	23%	41%	32%	34%	29%	38%	30%	
No	23	35	16	22	20	25	14	27	
DK/NA	46	43	43	47	45	47	48	42	
	AGE IN YRS.....				WHITE.....				
	18-34	35-49	50-64	65+	Men	Wom	Wht	Blk	Hsp
Yes	21%	36%	37%	34%	35%	31%	33%	32%	31%
No	31	18	20	25	22	24	23	18	27
DK/NA	49	46	43	42	43	44	44	49	42

43. Would you like to see the Biden administration try to restart the Obama-era nuclear arms agreement with Iran, or not?

	Tot	Rep	Dem	Ind	Men	Wom	WHITE..... 4 YR COLL DEG		
							Yes	No	
Yes	41%	12%	77%	38%	36%	46%	53%	30%	
No	46	81	10	46	52	40	37	62	
DK/NA	13	7	13	17	12	14	9	8	
	AGE IN YRS.....				WHITE.....				
	18-34	35-49	50-64	65+	Men	Wom	Wht	Blk	Hsp
Yes	42%	40%	42%	45%	31%	44%	38%	62%	40%
No	40	48	50	45	61	47	54	14	39
DK/NA	18	12	8	10	8	9	8	24	21

Exhibit 75



Exhibit 76



Exhibit 77



Warren Petersen
@votewarren

I'm drafting legislation to ban the use of Dominion software and equipment from the state of Arizona. My constituents do not trust it. Texas refused to use it. Too many concerns in states that have. There is no room for doubt when it comes to election integrity.

10:02 AM · Nov 20, 2020 · Twitter for Android

368 Retweets **46** Quote Tweets **1.2K** Likes



Exhibit 78



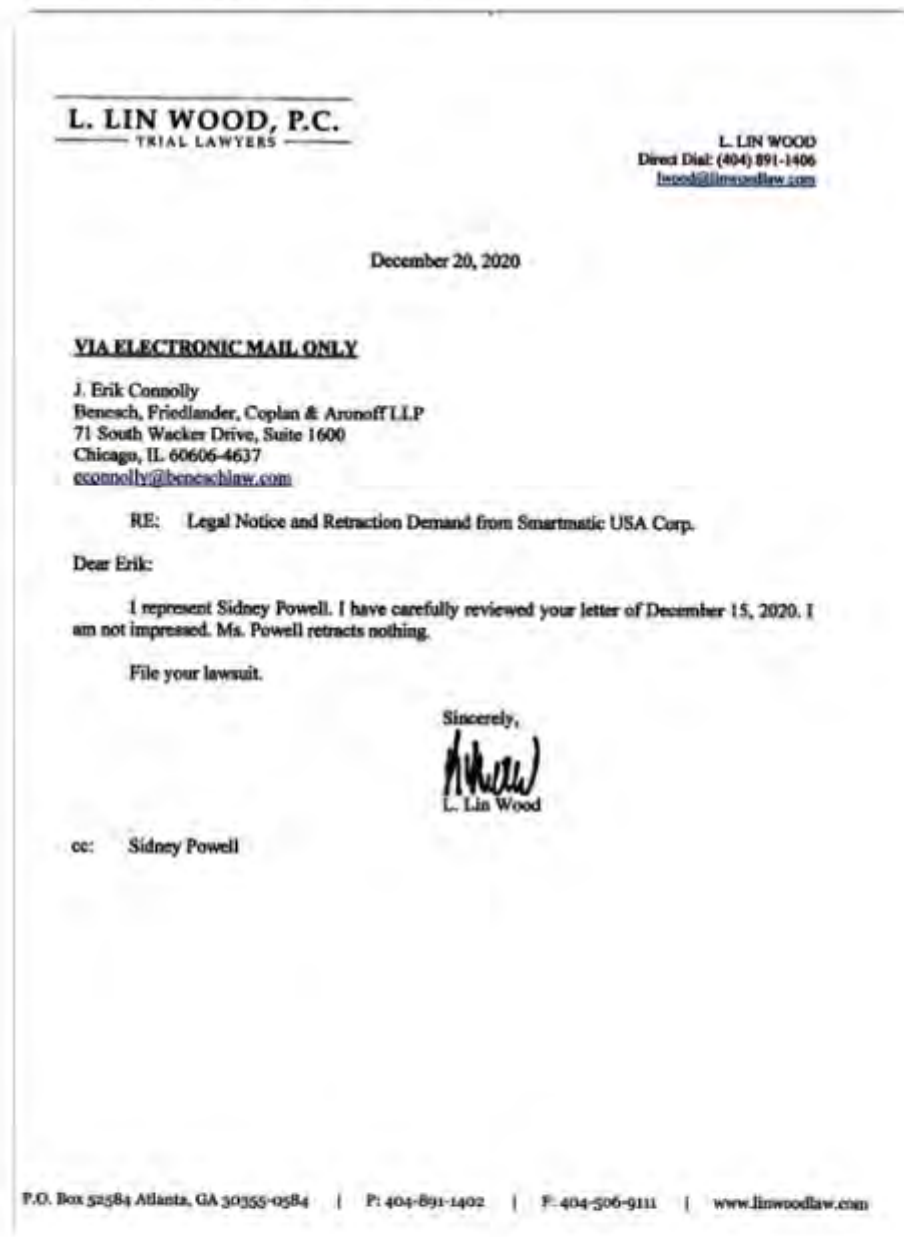
Tweet



Lin Wood
@LLinWood

Knowing my background & experience in defamation law, Sidney @SidneyPowell1 asked me to represent her & respond to SmartMatic litigation threat.

Since everything Sidney is saying about election fraud is documented TRUTH, my response to SmartMatic was simple & to the point.



1:43 PM - Dec 20, 2020 - Twitter for iPhone

32.6K Retweets **4.5K** Quote Tweets **96.7K** Likes

